

Mercury Electronic Reporting User Guide – Primary Authorized Official

Environmental Protection Agency

Office of Pollution Prevention and Toxics

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1 Introduction

This document presents the user guide for the Office of Pollution Prevention and Toxics (OPPT) Mercury Electronic Reporting (MER) application submission processs. This document is the user guide for the Primary Authorized Official (AO) user of the MER application.

The MER application is the electronic, web-based tool provided by the United States Environmental Protection Agency (EPA) for the submission of mercury data. As a Primary AO, you can create, modify, and/or submit a MER form. You can also delete MER forms, create amendments, and download the Copy of Record (CoR).

The TSCA mercury inventory rule ("Mercury; Reporting Requirements for Toxic Substances Control Act Mercury Inventory") requires manufacturers (including importers) and processors to report information to assist in the preparation of an inventory of mercury supply, use, and trade in the United States, where mercury is defined as elemental mercury and a mercury compound. The requirements apply to any person who manufactures (including imports) mercury or mercury-added products, or otherwise intentionally uses mercury in a manufacturing process. These persons must report to EPA the quantity of mercury they manufacture, use, import, store, sell and/or export. In some cases, EPA also requires identification of the industrial sector, trading country, type of product, and type of manufacturing process.

The Mercury Electronic Reporting (MER) application includes embedded help files and a downloadable user manual to guide you through the MER submission process. Reporters may submit information for elemental mercury, mercury compounds, or both in one report to the Agency.

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For questions concerning the 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).

1



2 System Requirements

To use the MER application to submit a 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 AO Functions

This section describes how to:

- Access the application
- Navigate the MER 'Home' screen
- Assign Supports to complete a form
- Start and complete the MER form
- Download a CoR
- Create an amendment
- Upload a Confidential Business Information (CBI) substantiation attachment

The Primary AO is responsible for the submission of original MER forms. As a Primary AO, you can create and submit a new form. You are also responsible for submitting amendments, unlocking submissions, and deleting forms. You can assign Supports (or other authorized individuals) to edit and complete a form on your behalf.

You can save the form at any point during the data entry process. The save functionality allows 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.

A Primary Agent/Consultant is an individual who has been hired to serve as a consultant for the company of the sponsoring AO, can potentially start and/or complete a MER form, and has the ability to submit amendments.

The Primary Support is designated by a PAO to provide supporting information on behalf of a company; examples include a corporate on-site contact, a technical contact, a paid employee of the company, an outside consultant for the company, or an authorized representative agent for the company.



Exhibit 3-1 displays a table of the user roles and capabilities within the MER application:

Exhibit 3-1 MER User Roles Matrix

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

3.1 Log into MER Application

Please see the Chemical Safety and Pesticide Programs (CSPP) Registration user guide on the 'Frequently Asked Questions' page within CDX for information regarding the registration process, different user role capabilities, and how to log into CDX.

After you create an account in CDX, click the 'Primary Authorized Official' link for the CSPP data flow to navigate to the 'Chemical Information Submission System' screen.

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.



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



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

3.2 MER Home Screen Navigation

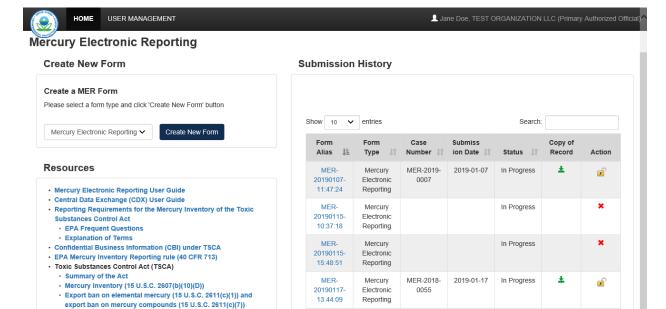
You can access the MER 'Home' screen by selecting 'Mercury Electronic Reporting – MER' from the submission type drop-down menu on the 'Chemical Information Submission System' screen and clicking the 'OK' button.



The MER 'Home' screen is the first screen within the MER application. It displays the 'Create New Form,' 'Resources,' and 'Submission History' sections and displays a link to the 'User Management' page.

- Create New Form: To create a new MER form, click the 'Create New Form' button to navigate to the 'Create Passphrase' page.
- **Resources:** Click the links within the 'Resources' section. Please see **Section 11.2** for additional information.
- **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 3.4**.
- User Management: Click the 'User Management' link to navigate to the 'User Management' screen. You can manage the access rights of Supports per form alias using the 'User Management' screen. For additional details about the 'User Management' screen, refer to Section 3.5.

Exhibit 3-3 shows a screen capture of the MER 'Home' screen:



MER-

20190207-

MER-

20190226

09:44:05

Mercury

Electronic Reporting

Mercury

Electronic

Reporting

Raise a Bug CDX Links .

In Progress

TSCA Hotline: (202) 554-1404 CDX Helpdesk: (888) 890-1995

Export Options: XML CSV PDF Excel

Exhibit 3-3 MER Home Screen

· Chemical Data Reporting (CDR)

. Conversion Calculator (grams to pounds)

NAICS Codes

Interstate Mercury Education and Reduction Clearinghouse



3.3 Create New Form

To create a new MER 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 3.6** for further instructions on creating a passphrase.

3.4 Submission History

Only one MER 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.

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

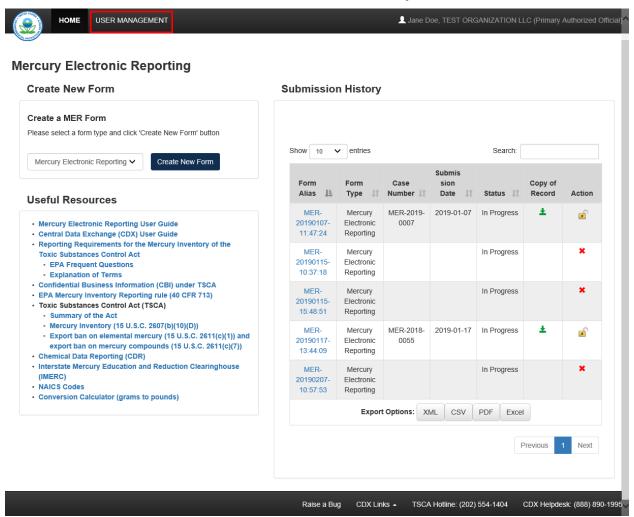
- Show Entries: Select a number (10, 25, 50, or 100) from the 'Show entries' drop-down menu to specify the number of entries that display on the current page.
- **Search:** Enter search criteria to filter the forms included within the 'Submission History' table.
- Form Alias: Displays the nickname of the form established by an AO at the time of populating a MER 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 MER form. This column displays 'Mercury Electronic Reporting.'
- Case Number: Displays the case number of a completed submission (MER-YYYY-XXXX) which the application automatically generates upon successful submission of a form. The 'YYYY' represents the reporting year for the form, 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 a MER form (either 'In Progress,' 'Submitted,' 'Completed,' or 'Failed').
 - Edit an 'In Progress' Form: To modify an existing MER 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.
 - o Amend a submitted form: To edit an already submitted MER 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 10** for further instructions on creating an amendment.



- CoR: Click the 'Copy of Record' icon (♣) to navigate to the 'Enter Passphrase' screen to continue to the 'CoR' screen. The 'Copy of Record' icon displays only after the form has been completed.
- Action: Click the 'Delete' icon (\times) to delete an in-progress form. Click the 'Lock' icon (\square) to unlock a form for an amendment. The form remains unlocked and will display the 'Unlocked' icon (\square) until the form is resubmitted by the AO.
- Export Options: Click the 'XML,' 'CSV,' 'PDF,' or 'Excel' button 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 (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 MER 'Submission History' table:

Exhibit 3-4 MER Submission History Table



Navigation: Click the 'User Management' link to access the 'User Management' screen to assign Supports or Primary Agents/Consultants (if applicable).



3.5 User Management

You can access the 'User Management' screen by clicking the 'User Management' link on the MER 'Home' screen.

On the 'User Management' screen, you have the ability to assign/un-assign one or more Supports to have access to modify any of the MER forms you have created.

Form Alias: A form alias is unavailable in this drop-down menu until one has been created. Select a form alias from the drop-down menu to begin assigning Supports. Once a form alias has been selected, the 'Assign Users' group box will update to display only the Supports or Primary Agents/Consultants who have identified you as their AO during CDX registration, or a user you have specified that is able to submit on your behalf.

Form Information: This field displays information pertaining to the form selected from the 'Form Alias' drop-down menu.

• Form Alias: Displays the form alias that a form is given.

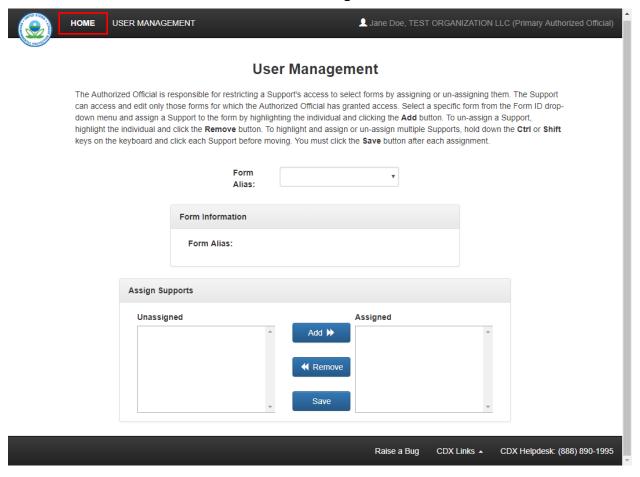
Assign Supports: This box shows all the Supports you can assign to complete a MER form for the form alias selected. To move support persons from the 'Unassigned' group box to the 'Assigned' group box, highlight an individual or multiple Support(s) and click the 'Add >>' button.

- Unassigned: This box/field contains the registered Support(s) and/or Primary Agent(s)/Consultant(s) associated with the AO who can potentially be assigned to access and edit the selected form. To move support persons from the 'Unassigned' group box to the 'Assigned' group box, highlight an individual or multiple support persons and click the 'Add >>' button. To highlight multiple support persons hold down the <Ctrl> key on your keyboard while clicking each Support and/or Primary Agent/Consultant. To highlight multiple consecutive support persons, hold down the <Shift> key on your keyboard while clicking the first and last Support and/or Primary Agent/Consultant in the list.
- Assigned: This box/field contains the registered Support(s) and/or Primary Agent(s)/Consultant(s) given permission, by the AO, to access and edit the selected form. This group box shows all support persons assigned to complete the MER form for a single form alias. To move Supports and/or Primary Agents/Consultants from the 'Assigned' group box to the 'Unassigned' group box highlight individual or multiple support persons and click the '<< Remove' button. To highlight multiple support persons hold down the <Ctrl> key on your keyboard while clicking each Support and/or Primary Agent/Consultant. To highlight multiple consecutive support persons, hold down the <Shift> key on your keyboard while clicking the first and last Support and/or Primary Agent/Consultant in the list.
- Add >>: Click the button to move selected Supports from the 'Unassigned' box to the 'Assigned' box.
- << **Remove:** Click the button to move selected Supports from the 'Assigned' box to the 'Unassigned' box.
- Save: Click the button to save the selection.



Exhibit 3-5 shows a screen capture of the 'User Management' screen:

Exhibit 3-5 User Management Screen



Navigation: Click the 'Home' link located within the application header to navigate to the MER 'Home' screen.

3.6 Create Passphrase

To start a new MER form click the 'Create New Form' button on the MER '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 a saved 'in progress' form, or be able to view your MER Form to print, submit, or make changes. You will need to complete a new 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 or reset it.

• **New Pass phrase:** 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

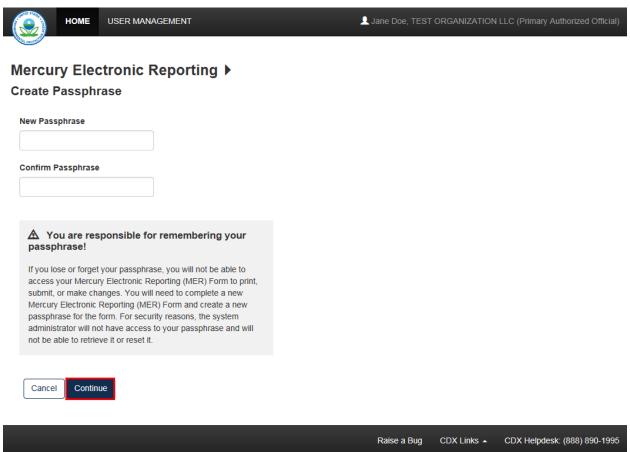


user, you are responsible for remembering your passphrase and distributing it to only authorized individuals. The passphrase is used as an encryption key to protect the contents of the form data.

• **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. Supports do not have the ability to start a new form or create a passphrase for a form.

Exhibit 3-6 shows a screen capture of the 'Create Passphrase' screen:

Exhibit 3-6 Create Passphrase Screen



Navigation: Create a passphrase and click the 'Continue' button to navigate to the 'Identification of Reporting Activity' screen in a MER form.

3.7 Enter Passphrase

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

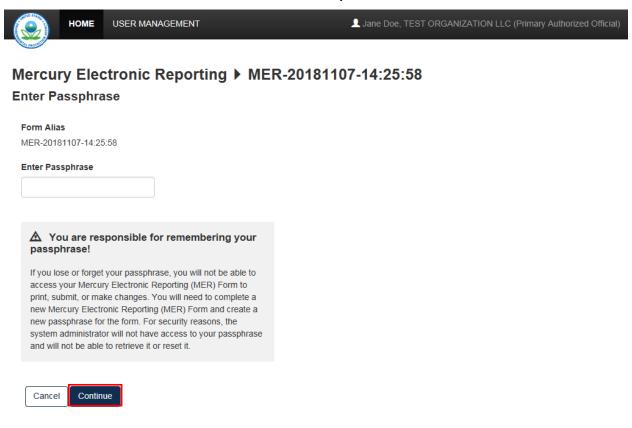
- Form Alias: Displays the alternate name that is used to identify the form.
- Enter Passphrase: Enter the same passphrase that was used to originally create the form. For security reasons, the system administrator does not have access to the passphrase and



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 3-7 shows a screen capture of the 'Enter Passphrase' screen:

Exhibit 3-7 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 'Identification of Reporting Activity' screen in a MER form.

CDX Links .

Raise a Bug

CDX Helpdesk: (888) 890-1995

3.8 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 MER 'Home' screen.
- User ID: Click the user ID link in the top right-hand corner to log out of the application.

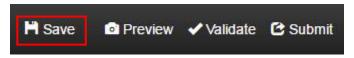
The following exhibits, Exhibit 3-8, Exhibit 3-9, Exhibit 3-10, Exhibit 3-11, and Exhibit 3-13 show screen captures for the bottom action bar:

• Save: Click the 'Save' link at any stage of completing a MER form to save the form. To generate and access links to other pages of the form within the navigation header, you must



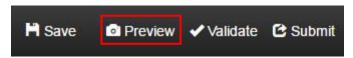
click the 'Save' link within the action bar. After you click the 'Save' link, you will receive a message indicating that all data entered in the form has been saved successfully. The save function does not validate any entered data. Click the 'Previous' and 'Continue' buttons on a form to save and validate the data entered within a form. The 'Previous' button validates any entered data. Click the 'X' button in the upper right-hand corner of the form in your browser to close the form without saving.

Exhibit 3-8 Action Bar - Save



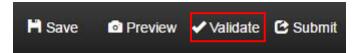
• **Preview:** Click the 'Preview' link to preview the form. After you click the 'Preview' link, you will be given the option to view a regular version of the PDF(s) or a sanitized version of the PDF(s) in which any information marked as CBI is redacted. Choosing either option will generate a watermarked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

Exhibit 3-9 Action Bar - Preview



• Validate: Click the 'Validate' link at any stage of completing a MER form to generate the 'MER Validation' window which displays a list of warning and error messages within a form. If the 'MER Validation' window does not display, you may need to disable the pop-up blocker within your internet browser. Refer to **Section 6** for more information on validating a form.

Exhibit 3-10 Action Bar - Validate



• **Submit:** Click the 'Submit' link to submit a MER form after completing all sections of a MER 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 MER form.

Exhibit 3-11 Action Bar - Submit





• **Resources:** Click the 'Resources' link located at the bottom of each screen, at any stage of completing a MER form to generate a 'Resources' window. Click any of the links within the 'Resources' window for additional information regarding a MER form.

Exhibit 3-12 shows a screen capture of the 'Resources' window:

Exhibit 3-12 Resources Window

Resources

×

The following **Resources** links are also available on the Home screen of the Mercury Electronic Reporting application:

- · Central Data Exchange (CDX) User Guide
- Reporting Requirements for the Mercury Inventory of the Toxic Substances
 Control Act
 - EPA Frequent Questions
 - Explanation of Terms
- Confidential Business Information (CBI) under TSCA
- EPA Mercury Inventory Reporting rule (40 CFR 713)
- Toxic Substances Control Act (TSCA)
 - Summary of the Act
 - Mercury Inventory (15 U.S.C. 2607(b)(10)(D))
 - Export ban on elemental mercury (15 U.S.C. 2611(c)(1)) and export ban on mercury compounds (15 U.S.C. 2611(c)(7))
- Chemical Data Reporting (CDR)
- Interstate Mercury Education and Reduction Clearinghouse (IMERC)
- NAICS Codes
- Conversion Calculator (grams to pounds)

- **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 MER 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.



- Click the 'Terms and Conditions' link to navigate to the CDX Terms and Conditions screen.
- Click the 'Privacy Notice' link to navigate to the CDX Privacy and Security Notice screen.

Exhibit 3-13 shows a screen capture of the action bar 'CDX Links':

CDX Homepage MyCDX Homepage EPA Homepage Terms and Conditions Privacy Notice Resources CDX Links TSCA Hotline: (202) 554-1404 CDX Helpdesk: (888) 890-1995

3.9 Search Substance Registry Services (SRS)

The 'Search SRS' button displays on various screens within a MER form to identify mercury compounds.

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 system allows you to enter each chemical by clicking the 'Save' button located at the bottom of the 'Search SRS' window. Once you enter all known chemical information, select a chemical from the list of results, and click the 'Save' button, the chemical information saves and populates into the mercury compounds table. The 'Action' 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.

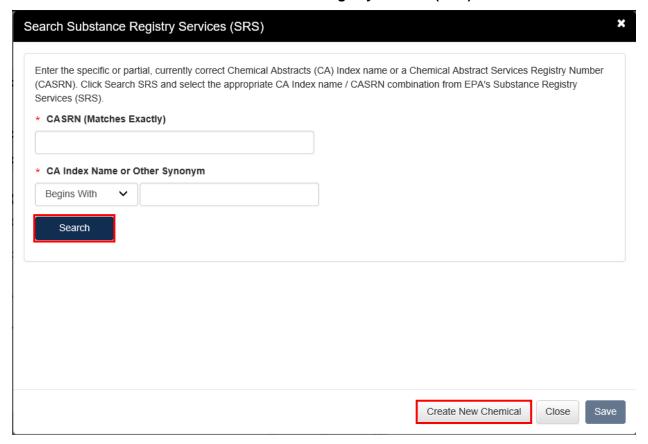
- Chemical Abstract Services Registry Number (CASRN): Enter the CASRN of the chemical; this field accommodates dashes. Either the 'CASRN' or 'CA Index Name or Other Synonym' field is required when searching SRS.
- CA Index Name or Other Synonym: Enter the chemical abstract '(CA) Index Name or Other Synonym' 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:** Click the 'Search' button to initiate the database search for the 'CASRN' or 'CA Index Name or Other Synonym' for the desired chemical.



- Create New Chemical: Click the 'Create New Chemical' button to generate the 'Chemical Not Found In Substance Registry Services' pop-up window.
- Close: Click the 'Close' button to navigate out of the 'Search Substance Registry Services (SRS)' window.
- Save: Click the 'Save' button to populate the selected chemical result into the mercury compound table.

Exhibit 3-14 shows a screen capture of the 'Search Substance Registry Services (SRS)' window:

Exhibit 3-14 Search Substance Registry Services (SRS) Window



Navigation: Click the 'Search' 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 corresponding 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 'Create New Chemical' button to generate the 'Chemical Not Found In Substance Registry Services' pop-up window.

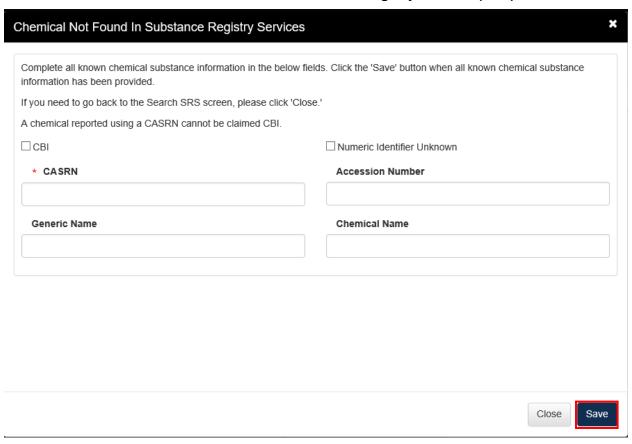
• **CBI:** Check the 'CBI' checkbox to disable the 'CASRN' field and make the 'Accession Number' and 'Generic Name' required.



- Numeric Identifier Unknown: Check to indicate that the CASRN or Accession Number is unknown and the 'Chemical Name' is required.
- CASRN: Enter the CASRN; this is a required field if the 'Numeric Identifier Unknown' checkbox is not checked. If the CASRN is unknown, check the 'Numeric Identifier Unknown' checkbox.
- Accession Number: Enter the accession number of a mercury compound. If the accession number is unknown, check the 'Numeric Identifier Unknown' checkbox. This is a required field if a chemical is claimed CBI.
- Chemical Name: Enter the chemical name. This is a required field if the 'CASRN' is entered, or if the 'Numeric Identifier Unknown' checkbox is checked.
- **Generic Name:** Enter the generic name of a chemical; this is a required field if a chemical is claimed CBI.
- **Close:** Click the 'Close' button to navigate back to the 'Search Substance Registry Services' pop-up window.
- Save: Click the 'Save' button to populate the manually entered chemical information into the mercury compound table on the screen from which the SRS search was initiated.

Exhibit 3-15 shows a screen capture of the 'Chemical Not Found In Substance Registry Services' window:

Exhibit 3-15 Chemical Not Found In Substance Registry Services (SRS) Window





Navigation: Click the 'Save' button to save the specified chemical information and navigate back to the screen from which the SRS search was initiated and where the chemical information will be populated. Click the 'Close' button to navigate back to the 'Search Substance Registry Services (SRS)' window. Click the 'X' located in the upper right-hand corner to close the window and navigate back to the screen from which the SRS search was initiated.



4 Reporting via the MER Application

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 CASRN and mercury compounds are inclusive of all substances where elemental mercury or a mercury compound is reacted with another chemical substance.

The MER application collects information separately for *Elemental Mercury* and *Mercury Compounds* with an option to report on both types of mercury in one submission.

For more information about the reporting requirements for the TSCA Mercury Inventory, please see [in-progress webpage] or https://www.epa.gov/sites/production/files/2018-06/documents/mercury_reporting_requirements_for_the_tsca_mercury_inventory_final_rule.pdf.

4.1 Create a MER Form

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

Refer to **Section 3.6** for additional details regarding the create passphrase process.

4.2 Identification of Reporting Activity

You can navigate to the 'Identification of Reporting Activity' screen by clicking the 'Create New Form' button and creating a new passphrase, or by accessing a MER form that is in progress in the 'Submission History' table and entering the passphrase associated with the selected form.

The 'Identification of Reporting Activity' 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 when contacting the help desk. Upon navigating to the 'Identification of Reporting Activity' screen, the system autogenerates a default alias comprised of a form type, date stamp, and time stamp in the following format: <MER-YYYYMMDD-HH:MM:SSS Time Zone> which can be edited as needed.

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, or otherwise intentionally used in a manufacturing process. The 'Mercury Compounds' section provides checkboxes to indicate that mercury compounds are manufactured, imported, or otherwise intentionally used in a manufacturing process. The 'Both' section allows a user to select checkboxes from both sections. If the 'Both' radio button is selected, at least one statement from the 'Elemental Mercury' and 'Mercury Compounds' section must be checked. Checking the individual checkboxes generates the corresponding reporting activities within a form; at least one checkbox must be checked.



- Amendment Explanation: Enter a reason as to why the user is modifying the submission. This field displays only after unlocking a form for an amendment and is required if displayed.
- 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-YYYMMDD-HH:MM:SS Time Zone>. This is a required field.
- **Elemental Mercury:** Select the 'Elemental Mercury' radio button to enable the relevant reporting activities. If selected, at least one checkbox must be checked identifying the elemental mercury activity for which the reporting company is submitting information.
 - o 1: My company manufactures (other than imports) elemental mercury: Check the checkbox to indicate that the reporting company manufactures elemental mercury. If checked, the 'Manufacture Mercury (Elemental)' screen displays within the form.
 - o **2:** My company imports elemental mercury to the United States: Check the checkbox to indicate that the reporting company imports elemental mercury. If checked, the 'Import Mercury (Elemental)' screen displays within the form.
 - 3: My company manufactures (other than imports) elemental mercury-added products: Check the checkbox to indicate the reporting company manufactures elemental mercury-added products. If checked, the 'Manufacture Products (Elemental)' screen displays within the form.
 - 4: My company imports elemental mercury-added products to the United States: Check the checkbox to indicate that the reporting company imports elemental mercury-added products. If checked, the 'Import Products (Elemental)' screen displays within the form.
 - o 5: 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 checked, the 'Manufacturing Process (Elemental)' screen displays within the form.
- **Mercury Compounds:** Select the 'Mercury Compounds' radio button to enable the relevant reporting activities. If selected, at least one checkbox must be checked identifying the mercury-compound activity for which the reporting company is submitting information.
 - o **6: My company manufactures (other than imports) mercury compounds:** Check the checkbox to indicate that the reporting company manufactures mercury compounds. If checked, the 'Manufacture Mercury (Compounds)' screen displays within the form.
 - o 7: My company imports mercury compounds to the United States: Check the checkbox to indicate that the reporting company imports mercury compounds. If checked, the 'Import Mercury (Compounds)' screen displays within the form.
 - 8: My company manufactures (other than imports) mercury compoundadded products: Check the checkbox to indicate that the reporting company



- manufactures mercury compound-added products. If checked, the 'Manufacture Products (Compounds)' screen displays within the form.
- 9: My company imports mercury compound-added products to the United **States:** Check the checkbox to indicate that the reporting company imports mercury compound-added products. If checked, the 'Import Products (Compounds)' screen displays within the form.
- 10: 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 checked, the 'Manufacturing Process (Compounds)' screen displays within the form.
- Both: Select the 'Both' radio button to display the statements associated with the 'Elemental Mercury' and 'Mercury Compounds' section. If selected, at least one checkbox must be checked from each section.

Exhibit 4-1 shows a screen capture of the 'Identification of Reporting Activity' screen (Scroll 1):

Exhibit 4-1 Identification of Reporting Activity Screen (Scroll 1)

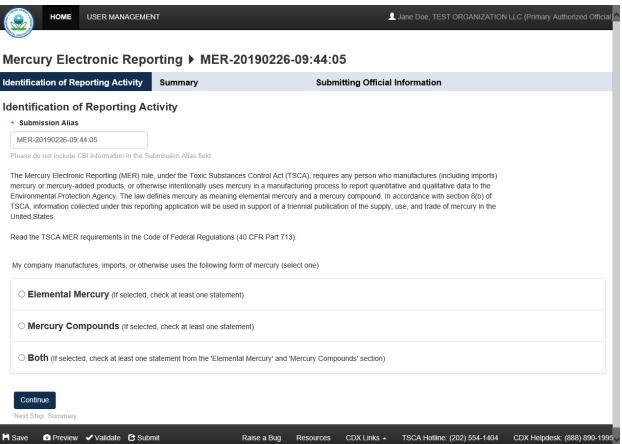




Exhibit 4-2 shows a screen capture of the 'Identification of Reporting Activity' screen (Scroll 2): **Exhibit 4-2 Identification of Reporting Activity Screen (Scroll 2)**

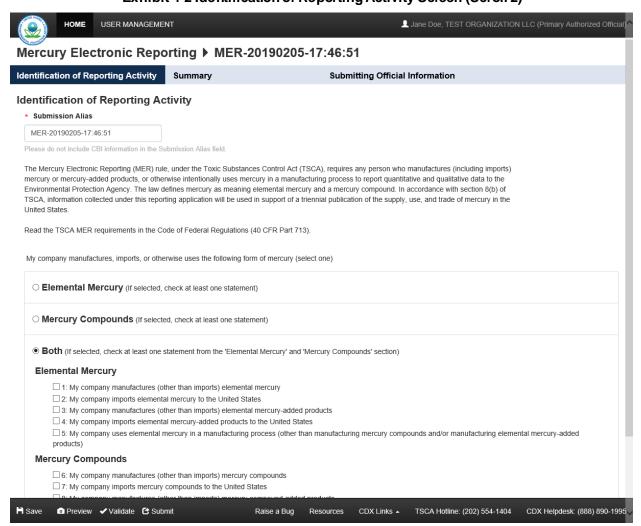
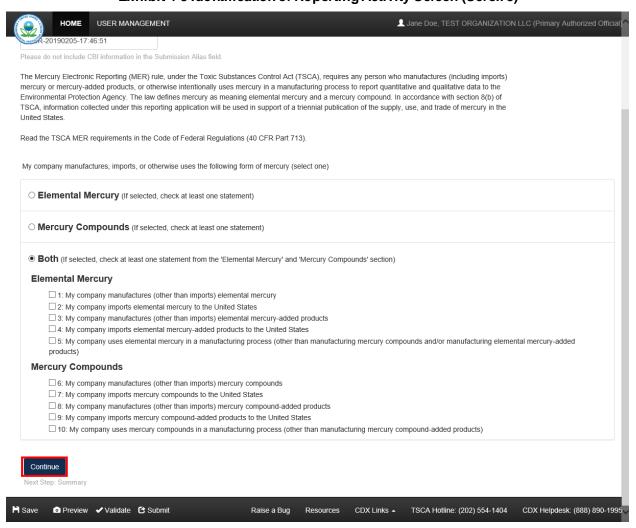




Exhibit 4-3 shows a screen capture of the 'Identification of Reporting Activity' screen (Scroll 3):

Exhibit 4-3 Identification of Reporting Activity Screen (Scroll 3)



Navigation: Click the 'Continue' button to navigate to the selected reporting activity statement screen that was selected. Each applicable reporting statement screen displays only upon clicking the 'Continue' button.

4.3 Reporting Activity 1: My company manufactures (other than imports) elemental mercury

You can access the 'Manufacture Mercury (Elemental)' screen by checking the '1' checkbox and clicking the 'Continue' button from the 'Identification of Reporting Activity' screen. You can also access this screen by clicking the 'Manufacture Mercury (Elemental)' link within the navigation header.

The 'Manufacture Mercury (Elemental)' screen provides fields to capture information regarding the manufacture of elemental mercury.

• My company reported amount of manufactured mercury in the most recent Chemical Data Reporting (CDR) reporting cycle: Check the checkbox if applicable.



• During the calendar year XXXX, my company manufactured (other than imported) a total ofpounds 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 (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. 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 Chemical Data Reporting (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. The entered values must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. A minimum and maximum range value is required if the fields are enabled.
• CBI: Check the 'CBI' checkbox to claim the amount of manufactured elemental mercury stored on-site as confidential.
• My company does not store elemental mercury on-site: Check the checkbox to indicate that elemental mercury is not stored on-site and disable the corresponding numerical input fields.
• During the calendar year XXXX, my company stored be tween and pounds of elemental mercury off-site: Enter a range of elemental mercury that has been stored off-site during the specified calendar year. The entered values must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. A minimum and maximum range value is required if the fields are enabled.
• CBI: Check the 'CBI' checkbox to claim the amount of manufactured elemental mercury stored off-site as confidential.
• My company does not store elemental mercury off-site: Check the checkbox to indicate that manufactured elemental mercury is not stored off-site and disable the corresponding numerical input fields.
• During the calendar year XXXX, my company distributedpounds 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 one (1) but less than or equal to 1,000,000. If a user enters a value of zero (0), then an error displays that the 'My company does not distribute elemental mercury' statement should be checked. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. This is a required field.

- **CBI:** Check the 'CBI' checkbox to claim the amount of elemental mercury distributed into domestic commerce as confidential.
- My company does not distribute elemental mercury: Check the checkbox to indicate that elemental mercury is not distributed into domestic commerce and disable the corresponding numerical input field, the 'Industry of Distribution' drop-down, and the industry of distribution table.
 - My company domestically distributed elemental mercury to the following industry: check all that apply: Enter search criteria (North American Industry Classification System (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the industry (ies) to which elemental mercury has been distributed by selecting the applicable NAICS code(s). Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the industries of distribution table. This is a required field if enabled.
 - o **CBI:** Check the 'CBI' checkbox to claim the industry (ies) of distribution to which elemental mercury has been distributed as confidential.
 - Refer to the NAICS Classification System to search for and enter the
 appropriate NAICS code: Click the link to generate the NAICS site in a separate
 browser tab if assistance is needed in searching for NAICS codes. Use the
 keyword search on the NAICS website
 (https://www.census.gov/eos/www/naics/index.html) to search for the desired
 industry.
 - Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
 - **Search:** Enter search criteria to filter results from the displayed industries of distribution.
 - NAICS: Displays the NAICS code of the selected industry of distribution. Click the column header to sort by ascending or descending order.
 - o **Industry of Distribution:** Displays the selected industry of distribution. Click the column header to sort by ascending or descending order.
 - o Action: Click the 'Delete' icon (✗) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.



- Remove All: Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.
- CBI: Check the 'CBI' checkbox to claim any additional information entered as confidential.

Exhibit 4-4 shows a screen capture of the 'Manufacture Mercury (Elemental)' screen (Scroll 1):

Exhibit 4-4 Manufacture Mercury (Elemental) Screen (Scroll 1)

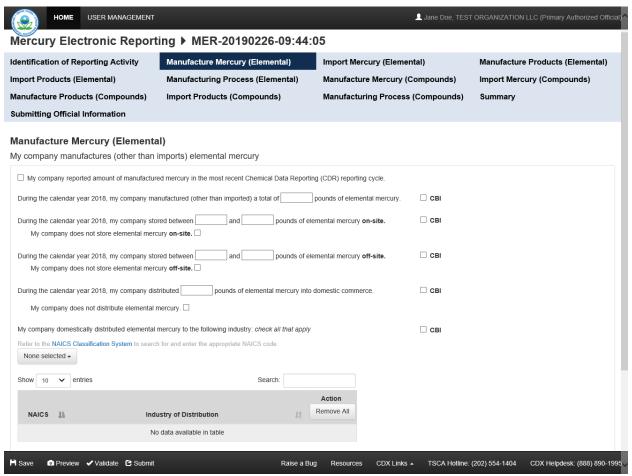
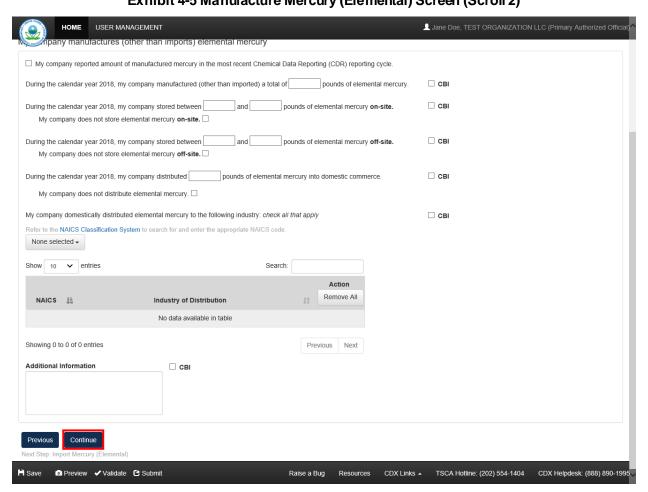




Exhibit 4-5 shows a screen capture of the 'Manufacture Mercury (Elemental)' screen (Scroll 2):

Exhibit 4-5 Manufacture Mercury (Elemental) Screen (Scroll 2)



Navigation: Click the 'Continue' button to navigate to the next reporting activity screen as applicable or the 'Summary' screen if no other statements were checked.

4.4 Reporting Activity 2: My company imports elemental mercury to the United States

You can access the 'Import Mercury (Elemental)' screen by checking the '2' checkbox and clicking the 'Continue' button from the previous screen or the 'Identification of Reporting Activity' screen. You can also access this screen by clicking the 'Import Mercury (Elemental)' link within the navigation header.

The 'Import Mercury (Elemental)' screen provides fields to capture information regarding importing elemental mercury.

- My company reported amount of imported mercury in the most recent Chemical Data Reporting (CDR) reporting cycle: Check the checkbox if applicable.
- 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 (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound.



Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. 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.
- During the calendar year XXXX, my company imported elemental mercury from the following countries: check all that apply: Select the country (ies) of origin from which elemental mercury was imported. This displays if the 'My company reported amount of imported mercury in the most recent CDR reporting cycle' statement is checked.
 - O My company imported elemental mercury from the following country: check all that apply: Select the country (ies) of origin from which elemental mercury was imported. Enter country search term(s) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) from which the reporting company has imported mercury. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of origin table. At least one country of origin is required.
 - o **CBI:** Check the 'CBI' checkbox to claim the country (ies) of origin as confidential.
 - o **Show entries:** Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of origin table
 - Search: Enter search criteria to filter results from the displayed countries of origin.
 - Country: Displays the country of origin selected from the drop-down. Click the column header to sort by ascending or descending order.
 - o **Action:** Click the 'Delete' icon (✗) to remove a specific country of origin. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
 - o **Remove All:** Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
 - o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.

During the calendar year XXXX, my company stored between	and
pounds of elemental mercury on-site: Enter a range of elemen	tal mercury that
has been stored on-site during the specified calendar year. The entered values	must be greater
than or equal to one (1) but less than or equal to 1,000,000. If a value is less t	han a pound,



round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store elemental mercury on-site: Check the checkbox to indicate that imported elemental mercury is not stored on-site and disable the corresponding numerical input fields.
- 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. The entered values must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store elemental mercury off-site: Check the checkbox to indicate that imported elemental mercury is not stored off-site and disable the corresponding numerical input fields.
- 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 one (1) but less than or equal to 1,000,000. A user must enter a value greater than or equal to one (1); if not, the application displays an error message that the 'My company does not distribute elemental mercury' statement should be checked. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. This is a required field.
- **CBI:** Check the 'CBI' checkbox to claim the amount of elemental mercury distributed into domestic commerce as confidential.
- My company does not distribute elemental mercury: Check the checkbox to indicate that elemental mercury is not distributed into domestic commerce and disable the corresponding numerical input field, the 'Industry of Distribution' drop-down, and the industry of distribution table. If a user enters a value of zero (0), then an error displays indicating that the 'My company does not distribute elemental mercury' statement should be checked.
 - My company domestically distributed elemental mercury to the following industry: check all that apply: Enter search criteria (North American Industry Classification System (NAICS code), industry code) into the drop-down menu; as



- values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the industry (ies) to which elemental mercury has been distributed by selecting the applicable NAICS code(s). Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the industry (ies) of distribution table.
- o **CBI:** Check the 'CBI' checkbox to claim the industry (ies) of distribution as confidential.
- Refer to the NAICS Classification System to search for and enter the
 appropriate NAICS code: Click the link to generate the NAICS site in a separate
 browser tab if assistance is needed in searching for NAICS codes. Use the
 keyword search on the NAICS website
 (https://www.census.gov/eos/www/naics/index.html) to search for the desired
 industry.
- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
- **Search:** Enter search criteria to filter results from the displayed industries of distribution.
- o **NAICS:** Displays the NAICS code of the selected industry of distribution. Click the column header to sort by ascending or descending order.
- o **Industry of Distribution:** Displays the selected industry of distribution. Click the column header to sort by ascending or descending order.
- o Action: Click the 'Delete' icon (✗) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- Remove All: Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.
- CBI: Check the 'CBI' checkbox to claim any additional information entered as confidential.



Exhibit 4-6 shows a screen capture of the 'Import Mercury (Elemental)' screen (Scroll 1):

Exhibit 4-6 Import Mercury (Elemental) Screen (Scroll 1)

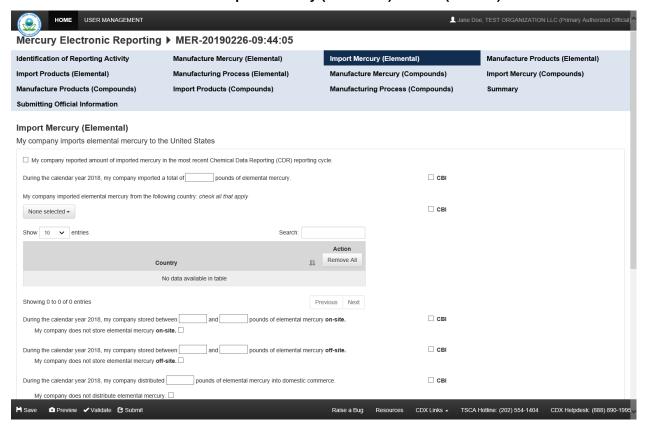
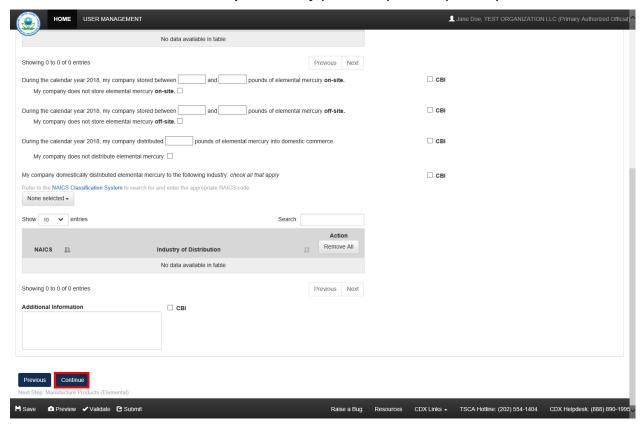




Exhibit 4-7 shows a screen capture of the 'Import Mercury (Elemental)' screen (Scroll 2):

Exhibit 4-7 Import Mercury (Elemental) Screen (Scroll 2)



Navigation: Click the 'Continue' button to navigate to the next reporting activity screen or the 'Summary' screen.

4.5 Reporting Activity 3: My company manufactures (other than imports) elemental mercury-added products

You can access the 'Manufacture Products (Elemental)' screen by checking the '3' checkbox on the 'Identification of Reporting Activity' screen or by clicking the 'Continue' button from the preceding reporting activity screen if applicable. You can also access this screen by clicking the 'Manufacture Products (Elemental)' link within the navigation header.

The 'Manufacture Products (Elemental)' screen provides fields to capture information regarding manufacturing (other than importing) elemental mercury-added products.

- My company reported national sales data to the most recent Interstate Mercury Education and Reduction Clearinghouse (IMERC) reporting cycle: Check the checkbox if applicable.
- 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 (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the



- nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. 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 a category (ies) from the drop-down menu; this populates the selected values into the corresponding category and subcategory table. Select the corresponding subcategory (ies) from the associated drop-down menu. At least one category is required to be selected.
 - 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.
 - o The 'Dental amalgam' category does not include any subcategories.
 - O 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.
 - 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.
 - The 'Measuring instruments' category includes the following subcategories: 'Barometer,' 'Fever thermometer,' 'Flow meter,' 'Hydrometer,' 'Hygrometer,' 'Manometer,' 'Non-fever thermometer,' 'Pyrometer,' 'Sphygmomanometer,' and 'Other (specify).' At least one subcategory value is required if displayed.
 - o The 'Pump seals' category does not include any subcategories.
 - 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.
 - 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.
- If the reporting company manufactured a mercury-added product that does not appear in the list provided, please select 'Other' under 'Miscellaneous/novelty mercury-added products' to type the product category manually.
- Category: Displays the value selected from the 'Category' drop-down menu. This displays 'Batteries,' 'Dental Amalgam,' 'Formulated Products (includes uses in cosmetics, pesticides, and laboratory chemicals),' 'Lighting, lamps, bulbs,' 'Measuring Instruments,' 'Miscellaneous/novelty mercury-added products,' 'Pump seals,' and/or 'Switches, relays, sensors, valves.'
- **CBI:** Check the 'CBI' checkbox for (a) category (ies) to claim a category value as confidential.
- **Subcategory:** Select the subcategory (ies) of the associated category; selected values automatically populate into the 'Subcategory' column.
- CBI: Check the 'CBI' checkbox to claim an individual subcategory as confidential.
- Action: Click the 'Delete' icon to remove a category and its associated subcategory (ies); a deletion confirmation pop-up message displays.
- During the calendar year XXXX, my company distributed elemental mercury in products into domestic commerce to the following Industries of Distribution: *check all that apply:* Select the industry (ies) to which the reporting company distributes elemental mercury in products. This displays only if the 'My company reported national sales data to the most recent Interstate Mercury Education and Reduction Clearinghouse (IMERC) reporting cycle' checkbox is checked.
- 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 which has been distributed into domestic commerce. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. If the entered value is zero (0), a user must check the 'My company does not distribute elemental mercury' checkbox. This field 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. NOTE: Enter the total weight of mercury (i.e., elemental mercury or mercury compound) in the products, not the weight of the products or total shipment(s).
- **CBI:** Check the 'CBI' checkbox to claim the amount of elemental mercury in products which has been distributed into domestic commerce as confidential.
- My company does not distribute elemental mercury: Check the checkbox to indicate that the company does not distribute elemental mercury in products into domestic commerce and disable the corresponding numerical input field, the 'Industry of Distribution' drop-down menu, and the industry of distribution table. This does not display if the 'My company



reported national sales data to the most recent Interstate Mercury Education and Reduction Clearinghouse (IMERC) reporting cycle' checkbox is checked.

- My company domestically distributed mercury-added products to the following industry: check all that apply: Enter search criteria (North American Industry Classification System) (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the industry (ies) to which elemental mercury has been distributed by selecting the applicable NAICS code(s). Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the industries of distribution table. This is a required field if the numerical input field is enabled.
- o **CBI:** Check the 'CBI' checkbox to claim the industry (ies) to which elemental mercury in products is distributed as confidential.
- Refer to the NAICS Classification System to search for and enter the appropriate NAICS code: Click the link to generate the NAICS site in a separate browser tab if assistance is needed in searching for NAICS codes. Use the keyword search on the NAICS website (https://www.census.gov/eos/www/naics/index.html) to search for the desired industry.
- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
- **Search:** Enter search criteria to filter results from the displayed industries of distribution.
- NAICS: Displays the NAICS code of a specific industry of distribution. Click the column header to sort by ascending or descending order.
- o **Industry of Distribution:** Displays a selected industry of distribution. Click the column header to sort by ascending or descending order.
- o **Action:** Click the 'Delete' icon (✗) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- o **Remove All:** Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- 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 one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. If the entered value is zero (0), a user must check the 'My company does not export elemental mercury' checkbox. This is a required field. NOTE: Enter the total weight of mercury (i.e., elemental mercury or mercury compound) in the products, not the weight of the products or total shipment(s).

- **CBI:** Check the 'CBI' checkbox to claim the amount of elemental mercury in mercury-added products which has been exported as confidential.
- My company does not export elemental mercury: Check the checkbox to indicate that the company does not export elemental mercury in mercury-added products and disable the corresponding numerical input field, the 'Country of Export' drop-down menu, and the country of export table.
 - O My company exported mercury-added products to the following country: check all that apply: Enter country search terms into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) to which elemental mercury in mercury-added products is exported. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of export table. At least one country must be selected if enabled.
 - o **CBI:** Check the 'CBI' checkbox to claim the destination country (ies) to which elemental mercury in mercury-added products is exported as confidential.
 - Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of export table.
 - **Search:** Enter search criteria to filter results from the displayed country (ies) of export.
 - o **Country:** Displays the country of export. Click the column header to sort by ascending or descending order.
 - o **Action:** Click the 'Delete' icon (✗) to remove a specific country of export. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
 - o **Remove All:** Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
 - o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.



• **CBI**: Check the 'CBI' checkbox to claim any additional information entered as confidential. Exhibit 4-8 shows a screen capture of the 'Manufacture Products (Elemental)' screen (Scroll 1):

Exhibit 4-8 Manufacture Products (Elemental) Screen (Scroll 1)

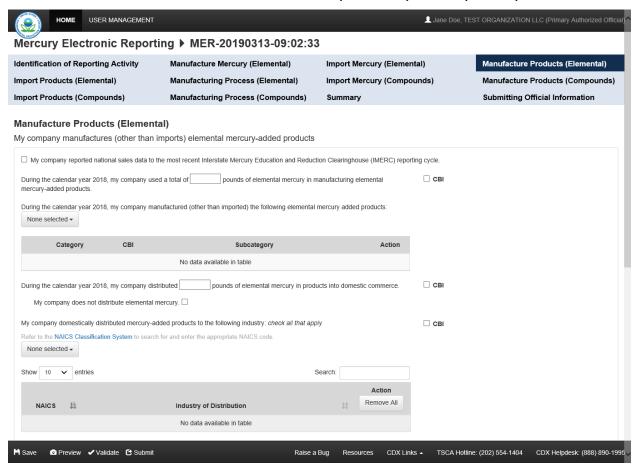
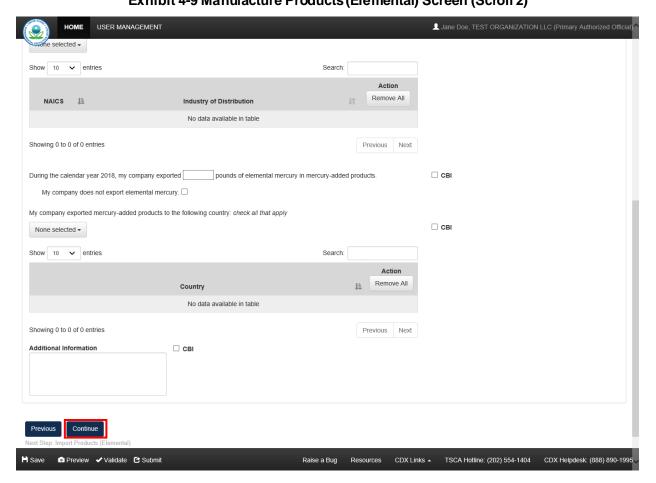




Exhibit 4-9 shows a screen capture of the 'Manufacture Products (Elemental)' screen (Scroll 2): Exhibit 4-9 Manufacture Products (Elemental) Screen (Scroll 2)



Navigation: Click the 'Continue' button to navigate to the next reporting activity screen or the 'Summary' screen as applicable.

4.6 Reporting Activity 4: My company imports elemental mercury-added products to the United States

You can access the 'Import Products (Elemental)' screen by checking the '4' checkbox and clicking the 'Continue' button from the previous screen or the 'Identification of Reporting Activity' screen. You can also access this screen by clicking the 'Import Products (Elemental)' link within the navigation header.

The 'Import Products (Elemental)' screen provides fields to capture information regarding importing elemental mercury-added products.

- My company reported national sales data to the most recent Interstate Mercury Education & Reduction Clearinghouse (IMERC) reporting cycle: Check the checkbox if applicable.
- 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 which the reporting company has imported. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. 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 a category (ies) from the drop-down menu; this populates the selected values into the corresponding category and subcategory table. Select the corresponding subcategory (ies) from the associated drop-down menu. At least one category is required to be selected.
 - 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.
 - o The 'Dental amalgam' category does not include any subcategories.
 - 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.
 - O 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.
 - 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.
 - o The 'Pump seals' category does not include any subcategories.
 - 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.
- 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.
- o If the reporting company imported a mercury-added product that does not appear in the list provided, please select 'Other' under 'Miscellaneous/novelty mercury-added products' to enter the product category manually.
- Category: Displays the value selected from the 'Category' drop-down menu. This displays 'Batteries,' 'Dental Amalgam,' 'Formulated Products (includes uses in cosmetics, pesticides, and laboratory chemicals),' 'Lighting, lamps, bulbs,' 'Measuring Instruments,' 'Miscellaneous/novelty mercury-added products,' 'Pump seals,' and/or 'Switches, relays, sensors, valves.'
- **CBI:** Check the 'CBI' checkbox for (a) category (ies) to claim a category value as confidential.
- **Subcategory:** Select the subcategory (ies) of the associated category; selected values automatically populate into the 'Subcategory' column. Check an individual 'CBI' checkbox to claim an individual subcategory as confidential.
- CBI: Check the 'CBI' checkbox to claim an individual subcategory as confidential.
- Action: Click the 'Delete' icon to remove a category and its associated subcategory (ies); a deletion confirmation pop-up message displays.
- My company imported mercury-added products from the following country: check all that apply: Select the country (ies) of origin from which the reporting company imports elemental mercury-added products. Enter country search term(s) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) from which the reporting company has imported mercury-added products. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of origin table. At least one country of origin is required.
- CBI: Check the 'CBI' checkbox to claim the country (ies) of origin as confidential.
- **Show entries:** Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of origin table.
- Search: Enter search criteria to filter results from the displayed country (ies) of origin.
- Country: Displays the country of origin. Click the column header to sort by ascending or descending order.
- Action: Click the 'Delete' icon (*) to remove a specific country of origin. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.



- Remove All: Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- During the calendar year XXXX, my company distributed elemental mercury in products into domestic commerce to the following Industries of Distribution: check all that apply: 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). This displays only if the 'My company reported national sales data to the most recent Interstate Mercury Education & Reduction Clearinghouse (IMERC) reporting cycle' checkbox is checked.
- During the calendar year XXXX, my company distributed _______pounds of elemental mercury in products into domestic commerce: Enter the amount of elemental mercury which has been distributed in products into domestic commerce. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. If the entered value is zero (0), a user must check the 'My company does not distribute elemental mercury' checkbox. This field 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. NOTE: Enter the total weight of mercury (i.e., elemental mercury or mercury compound) in the products, not the weight of the products or total shipment(s).
- **CBI:** Check the 'CBI' checkbox to claim the amount of elemental mercury distributed in products into domestic commerce as confidential.
- My company does not distribute elemental mercury: Check the checkbox to indicate that the company does not distribute elemental mercury in products into domestic commerce and disable the corresponding numerical input field, the 'Industry of Distribution' drop-down menu, and the industry of distribution table.
 - My company domestically distributed mercury-added products to the following industry: check all that apply: 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.
 - o **CBI:** Check the 'CBI' checkbox to claim the industries of distribution as confidential.
 - Refer to the NAICS Classification System to search for and enter the appropriate NAICS code: Click the link to generate the NAICS site in a separate browser tab if assistance is needed in searching for NAICS codes. Use the keyword search on the NAICS website



- (<u>https://www.census.gov/eos/www/naics/index.html</u>) to search for the desired industry.
- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
- **Search:** Enter search criteria to filter results from the displayed industries of distribution.
- o **NAICS:** Displays the NAICS code of a specific industry of distribution. Click the column header to sort by ascending or descending order.
- o **Industry of Distribution:** Displays a selected industry of distribution. Click the column header to sort by ascending or descending order.
- Action: Click the 'Delete' icon (※) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- Remove All: Click the 'Remove All' button to remove all values currently
 displayed in the table. A confirmation pop-up message displays to confirm the
 removal of all values; click the 'OK' button to remove or the 'Cancel' button to
 retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- 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 which has been exported. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. If the entered value is zero (0), a user must check the 'My company does not export elemental mercury' checkbox. This is a required field. NOTE: Enter the total weight of mercury (i.e., elemental mercury or mercury compound) in the products, not the weight of the products or total shipment(s).
- **CBI:** Check the 'CBI' checkbox to claim the amount of elemental mercury exported in mercury-added products as confidential.
- My company does not export elemental mercury: Check the checkbox to indicate that the company does not export elemental mercury in mercury-added products and disable the corresponding numerical input field, the 'Country of Export' drop-down menu, and the country of export table.
 - O My company exported mercury-added products to the following country: check all that apply: Enter country search terms into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) to



- which elemental mercury in mercury-added products is exported. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of export table. At least one country must be selected if enabled.
- o **CBI:** Check the 'CBI' checkbox to claim the country (ies) of export to which elemental mercury in mercury-added products is exported as confidential.
- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of export table.
- Search: Enter search criteria to filter results from the displayed country (ies) of export.
- o **Country:** Displays the country of export. Click the column header to sort by ascending or descending order.
- o **Action:** Click the 'Delete' icon (✗) to remove a specific country of export. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- o **Remove All:** Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.
- CBI: Check the 'CBI' checkbox to claim any additional information entered as confidential.



Exhibit 4-10 shows a screen capture of the 'Import Products (Elemental)' screen (Scroll 1):

Exhibit 4-10 Import Products (Elemental) Screen (Scroll 1)

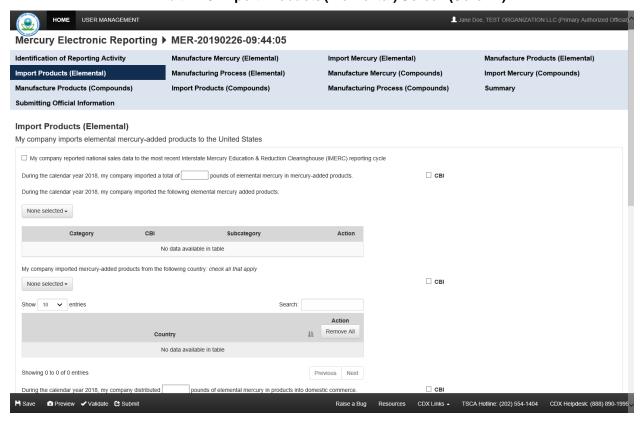




Exhibit 4-11 shows a screen capture of the 'Import Products (Elemental)' screen (Scroll 2):

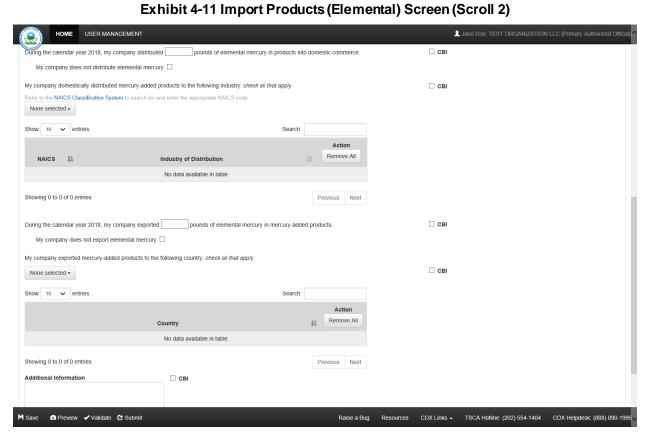
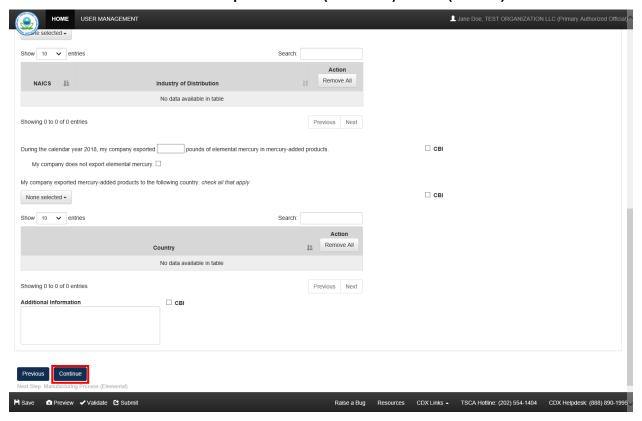




Exhibit 4-12 shows a screen capture of the 'Import Products (Elemental)' screen (Scroll 3):

Exhibit 4-12 Import Products (Elemental) Screen (Scroll 3)



Navigation: Click the 'Continue' button to navigate to the next reporting activity screen or the 'Summary' screen as applicable.

4.7 Reporting Activity 5: My company uses elemental mercury in a manufacturing process (other than manufacturing mercury compounds and/or manufacturing elemental mercury-added products)

You can access the 'Manufacturing Process (Elemental)' screen by checking the '5' checkbox and clicking the 'Continue' button from the previous screen or the 'Identification of Reporting Activity' screen. You can also access this screen by clicking the 'Manufacturing Process (Elemental)' link within the navigation header.

The 'Manufacturing Process (Elemental)' 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 (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. 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: Select the manufacturing process value(s) for which the company used elemental mercury. At least one process must be selected.
- **Process:** Select a value from the drop-down menu. The 'Process' drop-down contains 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. Click the column header to sort by ascending or descending order.
 - Other: A text field displays when 'Other' is selected to capture the manually entered process.
 - o CBI: Check the CBI' checkbox to claim a manufacturing process as confidential.
- Use(s): Select a corresponding use to the 'Process' value. The 'Use' drop-down contains the following values: 'Catalyst,' 'Reactant,' 'Reagent,' 'Cathode,' and 'Other.' At least one use is required for each identified process. Click the column header to sort by ascending or descending order.
 - Other: A text field displays when 'Other' is selected to capture the manually entered use description.
 - o CBI: Check the 'CBI' checkbox to claim a specific use(s) as confidential.
- Action: Click the 'Delete' icon (\times) to remove a specific process and use combination. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- During the calendar year XXXX, my company stored be tween ______ and ______ pounds of elemental mercury on-site: Enter a range to estimate the amount of elemental mercury that was stored on-site. The entered values must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store elemental mercury on-site: Check the checkbox to disable the corresponding numerical input fields and indicate 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 was stored off-site. The entered values must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store elemental mercury off-site: Check the checkbox to disable the corresponding numerical input fields and indicate that elemental mercury is not stored off-site.
- During the calendar year XXXX, my company distributed into domestic commerce final products that may contain detectable amounts of elemental mercury as a result of a manufacturing process to the following Industries of Distribution: check all that apply: Enter search criteria (North American Industry Classification System (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the applicable NAICS code (s) to which final products containing elemental mercury as a result of a manufacturing process have been distributed. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the industries of distribution table.
- My company does not domestically distribute final products that contain mercury as a result of this manufacturing process: Check the checkbox to disable the 'Industry of Distribution' drop-down menu and corresponding industry of distribution table.
- **CBI:** Check the 'CBI' checkbox to claim the selected industries of distribution as confidential.
 - Refer to the NAICS Classification System to search for and enter the appropriate NAICS code: Click the link to generate the NAICS site in a separate browser tab if assistance is needed in searching for NAICS codes. Use the keyword search on the NAICS website
 https://www.census.gov/eos/www/naics/index.html) to search for the desired industry.
 - Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
 - **Search:** Enter search criteria to filter results from the displayed industries of distribution.
 - NAICS: Displays the NAICS code of a specific industry of distribution. Click the column header to sort by ascending or descending order.
 - o **Industry of Distribution:** Displays a specific industry of distribution. Click the column header to sort by ascending or descending order.



- o **Action:** Click the 'Delete' icon (✗) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- Remove All: Click the 'Remove All' button to remove all values currently
 displayed in the table. A confirmation pop-up message displays to confirm the
 removal of all values; click the 'OK' button to remove or the 'Cancel' button to
 retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- During the calendar year XXXX, my company exported final products that contain detectable amounts of elemental mercury as a result of a manufacturing process to the following Countries: check all that apply: Enter country search terms into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) to which final products that may contain elemental mercury have been exported. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of export table. At least one country must be selected if enabled.
- My company does not export final products that may contain elemental mercury as a result of this manufacturing process: Check the checkbox to indicate that final products are not exported to any countries and disable the 'Country of Export' drop-down menu and corresponding country of export table.
- **CBI:** Check the 'CBI' checkbox to claim the countries to which the reporting company exports final products which may contain elemental mercury as confidential.
 - Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of export table.
 - **Search:** Enter search criteria to filter results from the displayed country (ies) of export.
 - o **Country:** Displays the country to which the reporting company exports final products that may contain elemental mercury. Click the column header to sort by ascending or descending order.
 - Action: Click the 'Delete' icon (X) to remove a specific country.
 - o **Remove All:** Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
 - o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.



• **CBI:** Check the 'CBI' checkbox to claim any additional information entered as confidential. Exhibit 4-13 shows a screen capture of the 'Manufacturing Process (Elemental)' screen (Scroll 1):

Exhibit 4-13 Manufacturing Process (Elemental) Screen (Scroll 1)

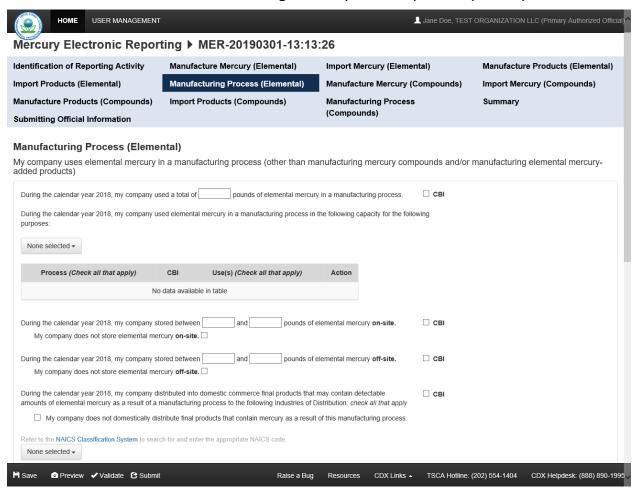




Exhibit 4-14 shows a screen capture of the 'Manufacturing Process (Elemental)' screen (Scroll 2):

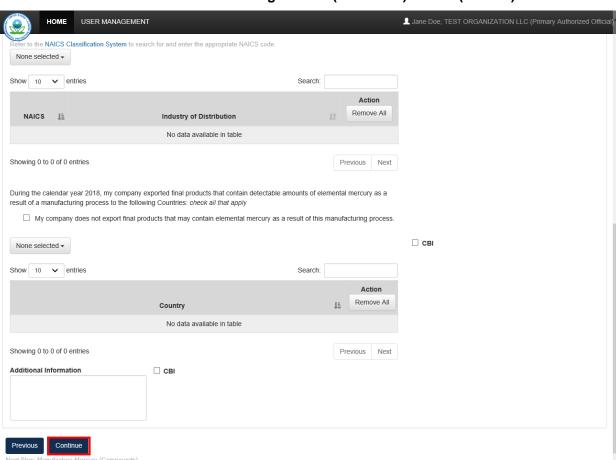


Exhibit 4-14 Manufacturing Process (Elemental) Screen (Scroll 2)

Navigation: Click the 'Continue' button to navigate to the next reporting activity screen or the 'Summary' screen as applicable.

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4.8 Reporting Activity 6: My company manufactures (other than imports) mercury compounds

You can access the 'Manufacture Mercury (Compounds)' screen by checking the '6' checkbox and clicking the 'Continue' button from the previous screen or the 'Identification of Reporting Activity' screen. You can also access this screen by clicking the 'Manufacture Mercury (Compounds)' link within the navigation header.

The 'Manufacture Mercury (Compounds)' 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 Chemical Data Reporting (CDR) reporting cycle: Check the checkbox if applicable.



- During the calendar year XXXX, my company manufactured (other than imported) a total of ______pounds of mercury compounds: Enter the amount of mercury compounds which the reporting company has manufactured. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. This field 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: Click the 'Search SRS' button to generate the 'SRS' window to search for and select the mercury compound(s) which the reporting company has manufactured during the specified calendar year. This field 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.
- **Search SRS:** Click the 'Search SRS' button to generate the 'Search Substance Registry Services' window. A user has the option to identify chemicals that are not within the SRS list. See **Section 3.9** for additional information regarding SRS.
- **Show entries:** Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the mercury compound table.
- Search: Enter search criteria to filter results from the displayed mercury compounds.
- CASRN: Displays the Chemical Abstracts Service Registry Number (CASRN) of the selected mercury compound (s); this displays 'Unknown' if the 'Unknown Numeric Identifier' checkbox is checked. Click the column header to sort by ascending or descending order.
- Accession Number: Displays the accession number of the selected mercury compound(s); this displays 'Unknown' if the 'Unknown Numeric Identifier' checkbox is checked. Click the column header to sort by ascending or descending order.
- **Mercury Compound:** Displays the chemical name of the selected mercury compound. Click the column header to sort by ascending or descending order.
- **CBI:** Displays a 'Y' or 'N' to indicate whether the identified chemical is claimed confidential.
- Generic Name: Displays the generic name of the confidential mercury compound.
- Action: Click the 'Delete' icon (\times) to remove a specific mercury compound. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.



• 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 which was used to manufacture mercury compounds. The entered value must be greater than or equal to zero (0) but less than or equal to 1,000,000. If this statement is not applicable to the reporting scenario, enter a value of zero (0). If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. 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 one (1 but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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 onsite as confidential.
• My company does not store elemental mercury on-site: Check the checkbox to disable the corresponding numerical 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 one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. The minimum and maximum range input fields are required it enabled.
• CBI: Check the 'CBI' checkbox to claim the amount of elemental mercury stored off-site as confidential.
• My company does not store elemental mercury off-site: Check the checkbox to disable the corresponding numerical input fields and claim that elemental mercury is not stored off-site.
• 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 one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered



into the maximum range field. 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.
- My company does not store mercury compounds on-site: Check the checkbox to disable the corresponding numerical 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 one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store mercury compounds off-site: Check the checkbox to disable the corresponding numerical input fields and claim that 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 mercury compounds which has been distributed into domestic commerce. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. If the entered value is zero (0), then an error displays indicating that the 'My company does not distribute mercury compounds' statement should be checked. This is a required field.
- **CBI:** Check the 'CBI' checkbox to claim the amount of mercury compounds distributed into domestic commerce as confidential.
- My company does not distribute mercury compounds: Check the checkbox to disable the corresponding numerical input field, the 'Industry of Distribution' drop-down, and the industry of distribution table.
 - My company domestically distributed mercury compounds to the following industry: check all that apply: Enter search criteria (North American Industry Classification System (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the applicable NAICS code(s) to which mercury compounds have been distributed. Click the first value in a list and click the <Shift> key and then the last value in a list to



- select multiple consecutive values. Checked values display within the industries of distribution table. This is a required field if enabled.
- Refer to the NAICS Classification System to search for and enter the appropriate NAICS code: Click the link to generate the NAICS site in a separate browser tab if assistance is needed in searching for NAICS codes. Use the keyword search on the NAICS website
 (https://www.census.gov/eos/www/naics/index.html) to search for the desired industry.
- o **CBI:** Check the 'CBI' checkbox to claim the industries of distribution as confidential.
- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
- **Search:** Enter search criteria to filter results from the displayed industries of distribution.
- o **NAICS:** Displays the NAICS code of the selected industry of distribution. Click the column header to sort by ascending or descending order.
- o **Industry of Distribution:** Displays the selected industry of distribution. Click the column header to sort by ascending or descending order.
- o **Action:** Click the 'Delete' icon (✗) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- Remove All: Click the 'Remove All' button to remove all values currently
 displayed in the table. A confirmation pop-up message displays to confirm the
 removal of all values; click the 'OK' button to remove or the 'Cancel' button to
 retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- During the 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 one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. This field 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. If the entered value is zero (0), then an error displays indicating that the 'My company does not export mercury compounds' statement should be 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.
- My company does not export mercury compounds: Check the checkbox to disable the corresponding numerical input field, the 'Country of Export' drop-down menu, and the country of export table.
- In calendar year XXXX, my company exported mercury compounds to the following countries: check all that apply: Enter country search terms into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. This displays only if the 'My company reported amount of manufactured (other than imported) mercury compounds in the most recent Chemical Data Reporting (CDR) reporting cycle' checkbox is checked.
 - My company exported mercury compounds to the following country: check all that apply: Enter country search terms into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) to which mercury compounds are exported. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of export table. At least one country must be selected if enabled.
 - o **CBI:** Check the 'CBI' checkbox to claim the country (ies) of export as confidential.
 - Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of export table.
 - Search: Enter search criteria to filter results from the displayed country (ies) of export.
 - o **Country:** Displays the country to which the reporting company exports mercury compounds. Click the column header to sort by ascending or descending order.
 - o **Action:** Click the 'Delete' icon (★) to remove a specific country of export. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
 - o **Remove All:** Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
 - o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.
- CBI: Check the 'CBI' checkbox to claim any additional information entered as confidential.



Exhibit 4-15 shows a screen capture of the 'Manufacture Mercury (Compounds)' screen (Scroll 1):

Exhibit 4-15 Manufacture Mercury (Compounds) Screen (Scroll 1)

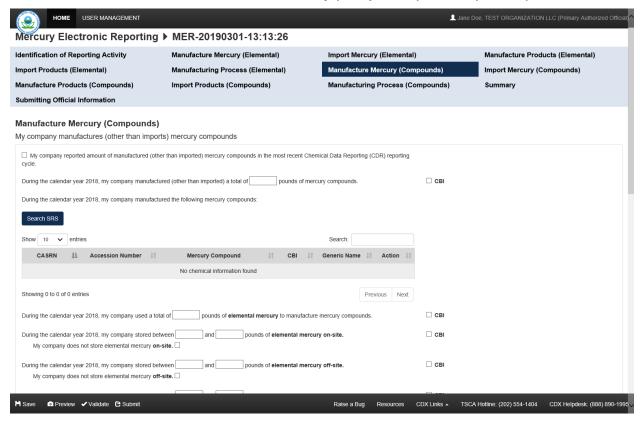




Exhibit 4-16 shows a screen capture of the 'Manufacture Mercury (Compounds)' screen (Scroll 2):

Exhibit 4-16 Manufacture Mercury (Compounds) Screen (Scroll 2)

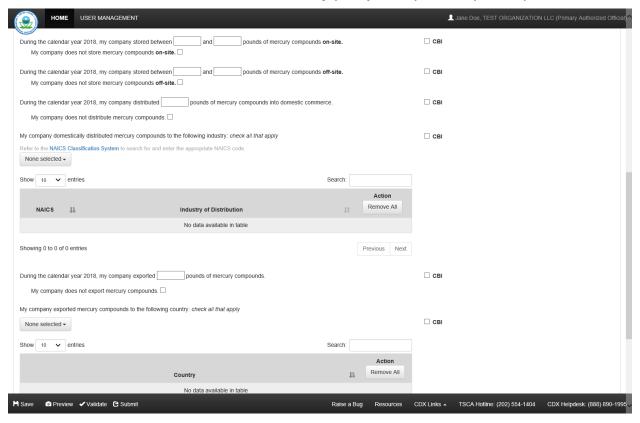




Exhibit 4-17 shows a screen capture of the 'Manufacture Mercury (Compounds)' screen (Scroll 3):

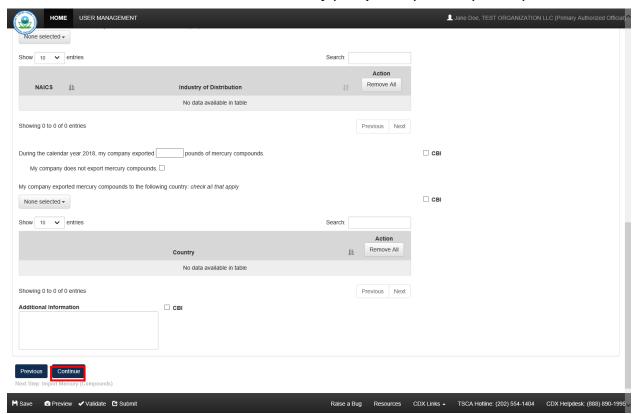


Exhibit 4-17 Manufacture Mercury (Compounds) Screen (Scroll 3)

Navigation: Click the 'Continue' button to navigate to the next reporting activity screen or the 'Summary' screen as applicable.

4.9 Reporting Activity 7: My company imports mercury compounds to the United States

You can access the 'Import Mercury (Compounds)' screen by checking the '7' checkbox and clicking the 'Continue' button from the previous screen or the 'Identification of Reporting Activity' screen. You can also access this screen by clicking the 'Import Mercury (Compounds)' link within the navigation header.

The 'Import Mercury (Compounds)' screen provides fields to capture information regarding the import of mercury compounds.

- My company reported amount of imported mercury compounds in the most recent Chemical Data Reporting (CDR) reporting cycle: Check the checkbox if applicable.
- During the calendar year XXXX, my company imported a total of ______ pounds of mercury compounds: Enter the amount of mercury compounds which the reporting company has imported during the specified calendar year. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s).



A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. This field 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.
- **Search SRS:** Click the 'Search SRS' button to generate the 'Search Substance Registry Services' window. See **Section 3.9** for additional information regarding SRS.
- **Show entries:** Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the mercury compound table.
- Search: Enter search criteria to filter results from the displayed mercury compounds.
- CASRN: Displays the Chemical Abstracts Service Registry Number (CASRN) of the selected mercury compound (s); this displays 'Unknown' if the 'Unknown Numeric Identifier' checkbox is checked. Click the column header to sort by ascending or descending order.
- Accession Number: Displays the accession number of the selected mercury compound(s); this displays 'Unknown' if the 'Unknown Numeric Identifier' checkbox is checked. Click the column header to sort by ascending or descending order.
- **Mercury Compound:** Displays the chemical name of the selected mercury compound. Click the column header to sort by ascending or descending order.
- **CBI:** Displays a 'Y' or 'N' to indicate whether the identified chemical is claimed confidential.
- Generic Name: Displays the generic name of the confidential mercury compound.
- Action: Click the 'Delete' icon (×) to remove a specific mercury compound. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- During the calendar year XXXX, my company imported mercury compounds from the following countries: check all that apply: Select the country (ies) from which the reporting company imported mercury compounds. This field displays if the 'My company reported amount of imported mercury compounds in the most recent Chemical Data Reporting (CDR) reporting cycle' checkbox is checked.
- My company imported mercury compounds from the following country: check all that apply: Select the country (ies) from which the reporting company imported mercury compounds. Enter country search term(s) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) from which the reporting company has imported mercury. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of origin table. At least one country of origin is required.



- CBI: Check the 'CBI' checkbox to claim the country (ies) of origin as confidential.
- **Show entries:** Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of origin table.
- Search: Enter search criteria to filter results from the displayed country (ies) of origin.
- **Country:** Displays the country of origin. Click the column header to sort by ascending or descending order.
- Action: Click the 'Delete' icon (×) to remove a specific country of origin. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- Remove All: Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- 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 (0) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store mercury compounds on-site: Check the checkbox to disable the corresponding numerical 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 mercury compounds stored off-site. The entered values must be greater than or equal to zero (0) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store mercury compounds off-site: Check the checkbox to disable the corresponding numerical 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 mercury compounds which has been distributed into domestic commerce. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. If a user enters a value of zero (0), then an error displays indicating that the 'My company does not distribute mercury compounds' statement should be checked. This is a required field if enabled.
- **CBI:** Check the 'CBI' checkbox to claim the amount of imported mercury compounds distributed into domestic commerce as confidential.
- My company does not distribute mercury compounds: Check the checkbox to disable the corresponding numerical input field, the 'Industry of Distribution' drop-down, and the industry of distribution table.
 - My company domestically distributed mercury compounds to the following industry: check all that apply: Click the drop-down menu to generate the drop-down and enter search criteria (North American Industry Classification System (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the applicable NAICS code(s) to which mercury compounds have been distributed. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the industries of distribution table. This is a required field if enabled.
 - Refer to the NAICS Classification System to search for and enter the
 appropriate NAICS code: Click the link to generate the NAICS site in a separate
 browser tab if assistance is needed in searching for NAICS codes. Use the
 keyword search on the NAICS website
 (https://www.census.gov/eos/www/naics/index.html) to search for the desired
 industry.
 - o **CBI:** Check the 'CBI' checkbox to claim the industries of distribution as confidential.
 - Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
 - **Search:** Enter search criteria to filter results from the displayed industries of distribution.
 - NAICS: Displays the NAICS code of the selected industry of distribution. Click the column header to sort by ascending or descending order.
 - o **Industry of Distribution:** Displays the selected industry of distribution. Click the column header to sort by ascending or descending order.



- o **Action:** Click the 'Delete' icon (✗) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- Remove All: Click the 'Remove All' button to remove all values currently
 displayed in the table. A confirmation pop-up message displays to confirm the
 removal of all values; click the 'OK' button to remove or the 'Cancel' button to
 retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- During the calendar year XXXX, my company exported _______pounds of mercury compounds: Enter the amount of mercury compounds that the reporting company has exported to the specified country of export. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. This field does not display if the 'My company reported amount of imported mercury compounds in the most recent CDR reporting cycle' statement is checked. If a user enters a value of zero (0), then an error displays indicating that the 'My company does not export mercury compounds' statement should be checked. This is a required field if displayed.
- **CBI:** Check the 'CBI' checkbox to claim the amount of mercury compounds that the reporting company has exported to the specified destination country as confidential.
- In calendar year XXXX, my company exported mercury compounds to the following countries: check all that apply: Select the country (ies) of export to which the company has exported mercury compounds. This field displays if the 'My company reported amount of imported mercury compounds in the most recent Chemical Data Reporting (CDR) reporting cycle' checkbox is checked.
- My company does not export mercury compounds: Check the checkbox to disable the corresponding numerical input field, the 'Country of Export' drop-down menu, and the corresponding country of export table.
 - My company exported mercury compounds to the following country: check all that apply: Select the country (ies) of export to which the company has exported mercury compounds. Enter country search terms into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) to which mercury compounds are exported. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of export table. At least one country must be selected if enabled.
 - o **CBI:** Check the 'CBI' checkbox to claim the country (ies) of export to which the reporting company exports mercury compounds as confidential.



- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of export table.
- **Search:** Enter search criteria to filter results from the displayed country (ies) of export.
- Country: Displays the country (ies) of export to which the company exports
 mercury compounds. Click the column header to sort by ascending or descending
 order.
- o **Action:** Click the 'Delete' icon (✗) to remove a specific country of export value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- o **Remove All:** Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.
- CBI: Check the 'CBI' checkbox to claim any additional information entered as confidential.



Exhibit 4-18 shows a screen capture of the 'Import Mercury (Compounds)' screen (Scroll 1):

Exhibit 4-18 Import Mercury (Compounds) Screen (Scroll 1)

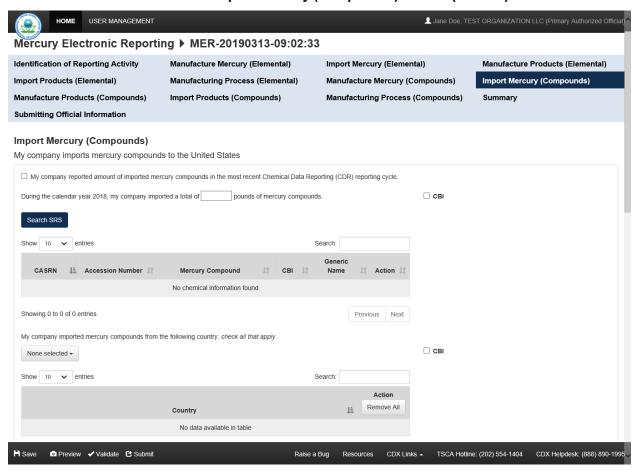




Exhibit 4-19 shows a screen capture of the 'Import Mercury (Compounds)' screen (Scroll 2):

Exhibit 4-19 Import Mercury (Compounds) Screen (Scroll 2)

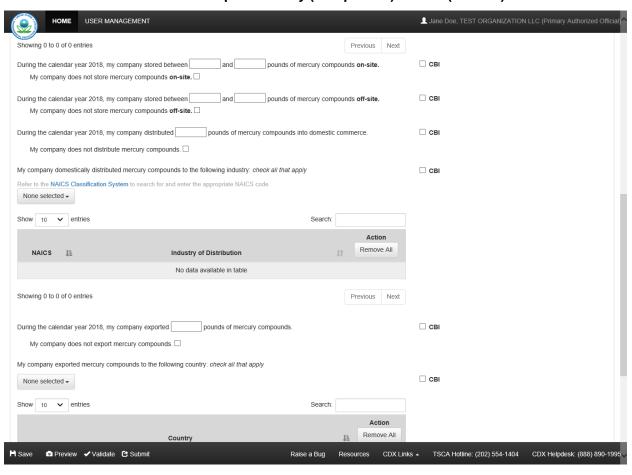
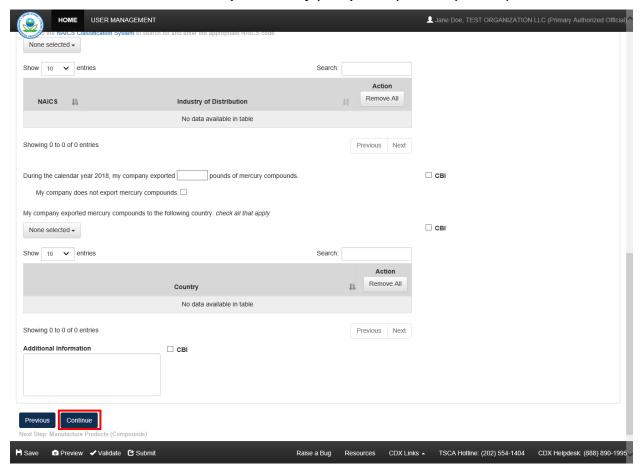




Exhibit 4-20 shows a screen capture of the 'Import Mercury (Compounds)' screen (Scroll 3):

Exhibit 4-20 Import Mercury (Compounds) Screen (Scroll 3)



Navigation: Click the 'Continue' button to navigate to the next reporting activity screen or the 'Summary' screen as applicable.

4.10 Reporting Activity 8: My company manufactures (other than imports) mercury compound-added products

You can access the 'Manufacture Products (Compounds)' screen by checking the '8' checkbox and clicking the 'Continue' button from the previous screen or the 'Identification of Reporting Activity' screen. You can also access this screen by clicking the 'Manufacture Products (Compounds)' link within the navigation header.

The 'Manufacture Products (Compounds)' screen provides fields to capture information regarding the manufacture (other than import) of mercury compound-added products.

- My company reported national sales data to the most recent Interstate Mercury Education & Reduction Clearinghouse (IMERC) reporting cycle: Check the checkbox if applicable.
- 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 (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. If a user enters a value of zero (0), then an error displays indicating that the 'My company does not use elemental mercury in the manufacturing of mercury compound added products' statement should be checked. This is a required field if enabled.

- **CBI:** Check the 'CBI' checkbox to claim the amount of elemental mercury used in the manufacturing of mercury compound-added products as confidential.
- My company does not use elemental mercury in the manufacturing of mercury compound-added products: Check the checkbox to disable the corresponding numerical input field.
- 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 (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. 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 (a) category (ies) from the dropdown menu; this populates the selected values into the corresponding category and subcategory table. Select the corresponding subcategory (ies) from the associated drop-down menu. At least one category is required to be selected.
 - O 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.
 - o The 'Dental amalgam' category does not include any subcategories.
 - 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.



- 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.
- 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.
- o The 'Pump seals' category does not include any subcategories.
- 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.
- 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.
- If the reporting company manufactured a mercury-added products that does not appear in the list provided, please select 'Other' under 'Miscellaneous/novelty mercury-added products' to enter the product category manually.
- Category: Displays the value selected from the 'Category' drop-down menu, including 'Batteries,' 'Dental Amalgam,' 'Formulated Products (includes uses in cosmetics, pesticides, and laboratory chemicals),' 'Lighting, lamps, bulbs,' 'Measuring Instruments,' 'Miscellaneous/novelty mercury-added products,' 'Pump seals,' and/or 'Switches, relays, sensors, valves.'
- **CBI:** Check the 'CBI' checkbox for (a) category (ies) to claim a category value as confidential.
- **Subcategory:** Select the subcategory (ies) of the associated category; selected values automatically populate into the 'Subcategory' column.
- CBI: Check the 'CBI' checkbox to claim an individual subcategory as confidential.
- Action: Click the 'Delete' icon to remove a category and its associated subcategory (ies). A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- 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 one (1) but less than or equal to 1,000,000. If a value is less than a



pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this falls outside of normal limits. This field does not display if the 'My company reported national sales data to the most recent Interstate Mercury Education & Reduction Clearinghouse (IMERC) reporting cycle' statement is checked. If a user enters a value of zero (0), then an error displays indicating that the 'My company does not distribute mercury compounds' statement should be checked. This is a required field if enabled. NOTE: Enter the total weight of mercury (i.e., elemental mercury or mercury compound) in the products, not the weight of the products or total shipment(s).

- **CBI:** Check the 'CBI' checkbox to claim the amount of mercury compounds in mercury compound-added products distributed into domestic commerce as confidential.
- During the calendar year XXXX, my company distributed mercury compound-added products into domestic commerce to the following Industries of Distribution: check all that apply: Click the drop-down menu to generate the drop-down and enter search criteria (North American Industry Classification System (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the applicable NAICS code(s) to which mercury compounds have been distributed. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the industries of distribution table. This is a required field if enabled. This field displays if the 'My company reported national sales data to the most recent Interstate Mercury Education & Reduction Clearinghouse (IMERC) reporting cycle' checkbox is checked.
- My company does not distribute mercury compounds: Check the checkbox to disable the corresponding numerical input field, the 'Industry of Distribution' drop-down, and the industry of distribution table.
 - My company domestically distributed mercury compound-added products to the following industry: check all that apply: Click the drop-down menu to generate the drop-down and enter search criteria (North American Industry Classification System (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the applicable NAICS code(s) to which mercury compounds have been distributed. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the industries of distribution table. This is a required field if enabled.
 - CBI: Check the 'CBI' checkbox to claim the industry (ies) of distribution as confidential.
 - Refer to the NAICS Classification System to search for and enter the appropriate NAICS code: Click the link to generate the NAICS site in a separate browser tab if assistance is needed in searching for NAICS codes. Use the keyword search on the NAICS website (https://www.census.gov/eos/www/naics/index.html) to search for the desired industry.



- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
- **Search:** Enter search criteria to filter results from the displayed industries of distribution.
- o **NAICS:** Displays the NAICS code of the selected industry of distribution. Click the column header to sort by ascending or descending order.
- o **Industry of Distribution:** Displays the selected industry of distribution. Click the column header to sort by ascending or descending order.
- o **Action:** Click the 'Delete' icon (✗) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- Remove All: Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- 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 which the reporting company has exported. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. If a user enters a value of zero (0), then an error displays indicating that the 'My company does not export mercury compound-added products' statement should be checked. This is a required field if enabled. NOTE: Enter the total weight of mercury (i.e., elemental mercury or mercury compound) in the products, not the weight of the products or total shipment(s).
- **CBI:** Check the 'CBI' checkbox to claim the amount of exported mercury compounds in mercury compound-added products as confidential.
- My company does not export mercury compound-added products: Check the checkbox to disable the corresponding numerical input field, the 'Country of Export' drop-down menu, and the corresponding country of export table.
 - My company exported mercury compound-added products to the following country: check all that apply: Select the country (ies) to which the reporting company exports mercury compound-added products. Enter country search terms into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) to which mercury compound-added



products is (are) exported. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of export table. At least one country is required to be selected if enabled.

- o **CBI:** Check the 'CBI' checkbox to claim the country (ies) to which the reporting company exports mercury-added products as confidential.
- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of export table.
- **Search:** Enter search criteria to filter results from the displayed country (ies) of export.
- Country: Displays the country to which the company exports mercury-added products.
- o **Action:** Click the 'Delete' icon (✗) to remove a specific country of export. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- Remove All: Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.
- CBI: Check the 'CBI' checkbox to claim any additional information entered as confidential.



Exhibit 4-21 shows a screen capture of the 'Manufacture Products (Compounds)' screen (Scroll 1):

Exhibit 4-21 Manufacture Products (Compounds) Screen (Scroll 1)

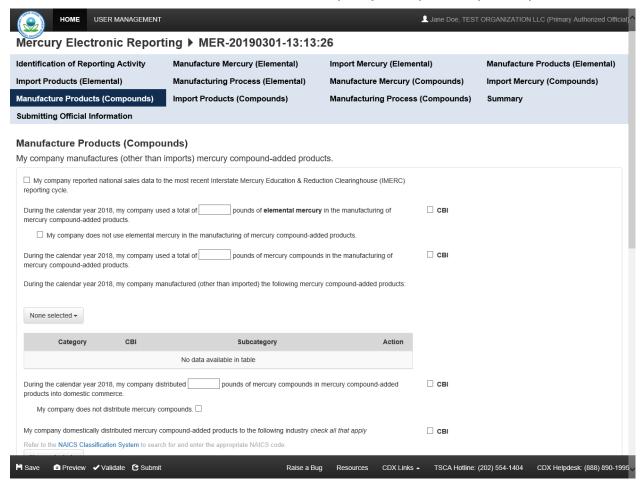




Exhibit 4-22 shows a screen capture of the 'Manufacture Products (Compounds)' screen (Scroll 2):

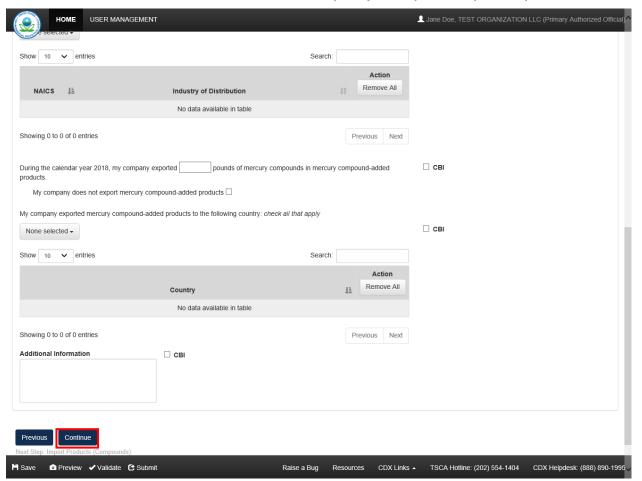


Exhibit 4-22 Manufacture Products (Compounds) Screen (Scroll 2)

Navigation: Click the 'Continue' button to navigate to the next reporting activity screen or the 'Summary' screen as applicable.

4.11 Reporting Activity 9: My company imports mercury compound-added products to the United States

You can access the 'Import Products (Compounds)' screen by checking the '9' checkbox and clicking the 'Continue' button from the previous screen or the 'Identification of Reporting Activity' screen. You can also access this screen by clicking the 'Import Products (Compounds)' link within the navigation header.

The 'Import Products (Compounds)' screen provides fields to capture information regarding the import of mercury compound-added products.

• My company reported national sales data to the most recent Interstate Mercury Education & Reduction Clearinghouse (IMERC) reporting cycle: Check the checkbox if applicable.



- During the calendar year XXXX, my company imported a total of ______ pounds of mercury compounds in mercury compound-added products: Enter the amount of mercury compounds in mercury compound-added products imported during the specified calendar year. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. This is a required field.
- **CBI:** Check the 'CBI' checkbox to claim the amount of mercury compounds in mercury compound-added products as confidential.
- During the calendar year XXXX, my company imported the following mercury compound-added products: Select a category (ies) from the drop-down menu; this populates the selected values into the corresponding category and subcategory table. Select the corresponding subcategory (ies) from the associated drop-down menu. At least one category is required to be selected.
 - 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.
 - o The 'Dental amalgam' category does not include any subcategories.
 - 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.
 - 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.
 - 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.
 - o The 'Pump seals' category does not include any subcategories.
 - 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.
- 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.
- If the reporting company manufactured a mercury-added product that does not appear in the list provided, please select 'Other' under 'Miscellaneous/novelty mercury-added products' to type the product category manually.
- Category: Displays the value selected from the 'Category' drop-down menu, including 'Batteries,' 'Dental Amalgam,' 'Formulated Products (includes uses in cosmetics, pesticides, and laboratory chemicals),' 'Lighting, lamps, bulbs,' 'Measuring Instruments,' 'Miscellaneous/novelty mercury-added products,' 'Pump seals,' and/or 'Switches, relays, sensors, valves.'
- **CBI:** Check the 'CBI' checkbox for (a) category (ies) to claim a category value as confidential.
- **Subcategory:** Select the subcategory (ies) of the associated category; selected values automatically populate into the 'Subcategory' column.
- CBI: Check the 'CBI' checkbox to claim an individual subcategory as confidential.
- Action: Click the 'Delete' icon (\times) to remove a category and its associated subcategory (ies). A deletion confirmation pop-up message displays to confirm the removal of the values; click the 'OK' button to remove or the 'Cancel' button to retain the values.
- My company imported mercury compound-added products from the following country: check all that apply: Select the country (ies) of origin from which the reporting company imports mercury compounds. Enter country search term(s) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) from which the reporting company has imported mercury. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of origin table. 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 compounds as confidential.
- **Show entries:** Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of origin table.
- Search: Enter search criteria to filter results from the displayed country (ies) of origin.
- **Country:** Displays the country from which a company imports mercury compound-added products.
- Action: Click the 'Delete' icon (*) to remove a specific country of origin value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK'



button to remove or the 'Cancel' button to retain the value. Click the 'Remove All' button to remove all values currently displayed in the table.

- **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- 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 products distributed into domestic commerce during the specified calendar year. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. This statement does not display if the 'My company reported national sales data to the most recent IMERC reporting cycle' statement is checked. If a user enters a value of zero (0), then an error displays indicating that the 'My company does not domestically distribute mercury compound-added products' statement should be checked. This is a required field if displayed. NOTE: Enter the total weight of mercury (i.e., elemental mercury or mercury compound) in the products, not the weight of the products or total shipment(s).
- **CBI:** Check the 'CBI' checkbox to claim the amount of mercury compounds in mercury compound-added products distributed into domestic commerce as confidential.
- My company does not domestically distribute mercury compound-added products: Check the checkbox to disable the corresponding numerical input field, the 'Industry of Distribution' drop-down, and the industry of distribution table.
- During the calendar year XXXX, my company distributed mercury compounds in products into domestic commerce to the following Industries of Distribution: check all that apply: Click the drop-down menu to generate the drop-down and enter search criteria (North American Industry Classification System (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. This displays only if the 'My company reported national sales data to the most recent Interstate Mercury Education & Reduction Clearinghouse (IMERC) reporting cycle' checkbox is checked.
 - Mv company domestically distributed mercury compound-added products to the following industry: check all that apply: Click the drop-down menu to generate the drop-down and enter search criteria (North American Industry Classification System (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the applicable NAICS code(s) to which mercury compounds have been distributed. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the industries of distribution table.
 - CBI: Check the 'CBI' checkbox to claim the industry (ies) of distribution as confidential.



- Refer to the NAICS Classification System to search for and enter the
 appropriate NAICS code: Click the link to generate the NAICS site in a separate
 browser tab if assistance is needed in searching for NAICS codes. Use the
 keyword search on the NAICS website
 (https://www.census.gov/eos/www/naics/index.html) to search for the desired
 industry.
- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
- **Search:** Enter search criteria to filter results from the displayed industries of distribution.
- o NAICS: Displays the NAICS code of the selected industry of distribution.
- o **Industry of Distribution:** Displays the selected industry of distribution.
- o Action: Click the 'Delete' icon (✗) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- o **Remove All:** Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- 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 which the company exported. The entered value must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. If a user enters a value of zero (0), then an error displays indicating that the 'My company does not export mercury compound-added products' statement should be checked. This is a required field if enabled. NOTE: Enter the total weight of mercury (i.e., elemental mercury or mercury compound) in the products, not the weight of the products or total shipment(s).
- **CBI:** Check the 'CBI' checkbox to claim the amount of mercury compounds in mercury compound-added products which the reporting company has exported as confidential.
- My company does not export mercury compound-added products: Check the checkbox to disable the corresponding numerical input field, the 'Country of Export' drop-down menu, and the country of export table.
 - My company exported mercury compound-added products to the following country: check all that apply: Select the country (ies) to which the reporting



company exported mercury compounds in mercury compound-added products. Enter country search terms into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the country (ies) to which mercury compound-added products were exported. Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the country of export table. At least one country is required to be selected if enabled.

- CBI: Check the 'CBI' checkbox to claim the destination country (ies) to which
 the reporting company exported mercury compound-added products as
 confidential.
- Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of export table.
- **Search:** Enter search criteria to filter results from the displayed country (ies) of export.
- o **Country:** Displays the country to which the company exported mercury compound-added products.
- o **Action:** Click the 'Delete' icon (✗) to remove a specific country of export value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- o **Remove All:** Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
- o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.
- CBI: Check the 'CBI' checkbox to claim any additional information entered as confidential.



Exhibit 4-23 shows a screen capture of the 'Import Products (Compounds)' screen (Scroll 1): Exhibit 4-23 Import Products (Compounds) Screen (Scroll 1)

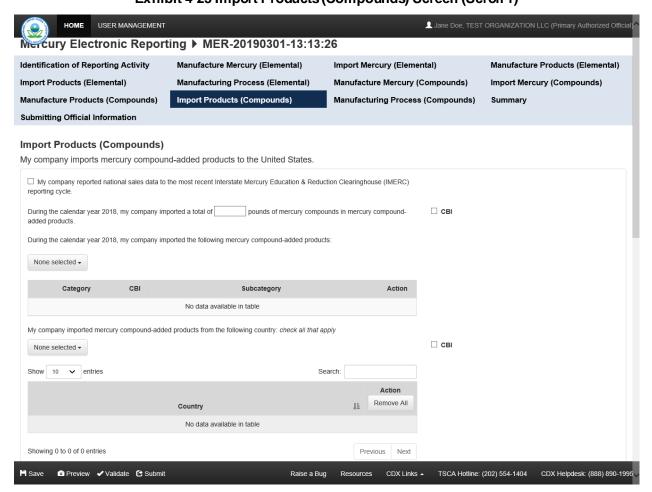




Exhibit 4-24 shows a screen capture of the 'Import Products (Compounds)' screen (Scroll 2): Exhibit 4-24 Import Products (Compounds) Screen (Scroll 2)

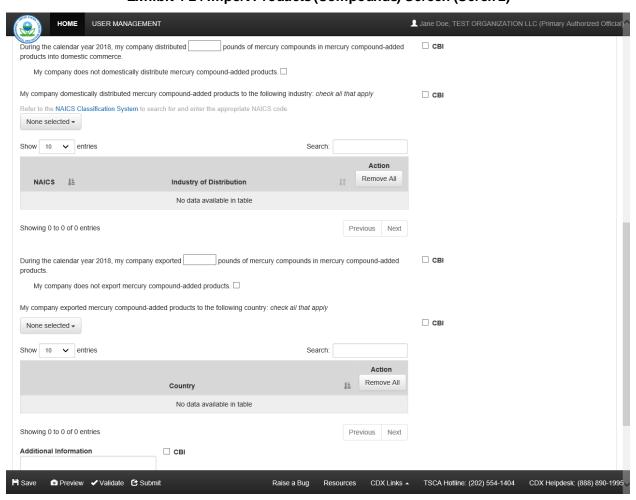
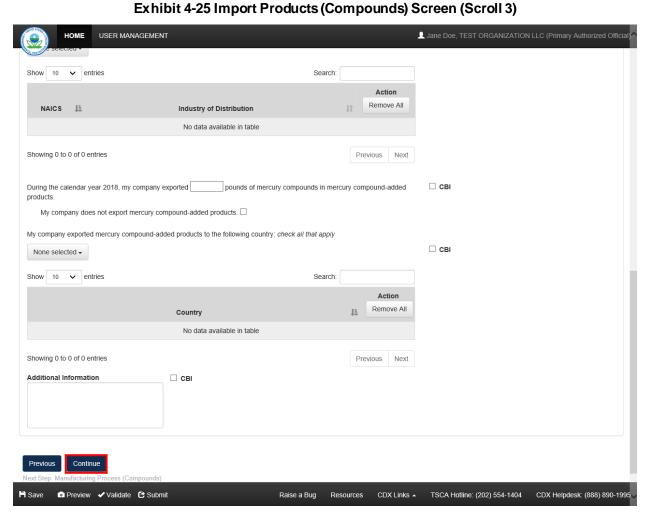




Exhibit 4-25 shows a screen capture of the 'Import Products (Compounds)' screen (Scroll 3):



Navigation: Click the 'Continue' button to navigate to the next reporting activity screen or the 'Summary' screen as applicable.

4.12 Reporting Activity 10: My company uses mercury compounds in a manufacturing process (other than manufacturing mercury compound-added products)

You can access the 'Manufacturing Process (Compounds)' screen by checking the '10' checkbox and clicking the 'Continue' button from the previous screen or the 'Identification of Reporting Activity' screen. You can also access this screen by clicking the 'Manufacturing Process (Compounds)' link within the navigation header.

The 'Manufacturing Process (Compounds)' 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 (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. 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 were used during the specified year. At least one process is required to be checked.
- **Process:** Select a value from the drop-down menu which populates into the column. The 'Process' drop-down contains 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).' At least one process is required to be checked. Click the column header to sort by ascending or descending order.
 - Other: A text displays when 'Other' is selected to capture the manually entered process description.
 - o CBI: Check the CBI' checkbox to claim a manufacturing process as confidential.
- Use(s): Select a corresponding value to the 'Process' value from the 'Use(s)' drop-down menu. The 'Use' drop-down contains the following values: 'Catalyst,' 'Reactant,' 'Reagent,' 'Cathode,' and 'Other.' At least one use is required for each identified process. Click the column header to sort by ascending or descending order.
 - Other: A text field displays when 'Other' is selected to capture the manually entered use description.
 - o CBI: Check the 'CBI' checkbox to claim a specific use(s) as confidential.
- Action: Click the 'Delete' icon (×) to remove a specific process and use combination. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
- 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 one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store elemental mercury on-site: Check the checkbox to indicate that elemental mercury is not stored on-site and disable the corresponding numerical input fields.



- During the calendar year XXXX, my company stored between 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 one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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. • My company does not store elemental mercury off-site: Check the checkbox to indicate that elemental mercury is not stored off-site and disable the corresponding numerical input fields. During the calendar year XXXX, my company stored between _____ 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
- of mercury compounds stored on-site during the specified calendar year. The entered values must be greater than or equal to one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store mercury compounds on-site: Check the checkbox to indicate that mercury compounds are not stored on-site and disable the corresponding numerical input fields.
- 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 one (1) but less than or equal to 1,000,000. If a value is less than a pound, round to the nearest pound. Decimal values are not accepted in the numerical input field (s). A warning message displays within the validation window if a value greater than or equal to 500,000 is entered, as this value falls outside of normal limits. An error message displays if zero (0) is entered into the maximum range field. 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.
- My company does not store mercury compounds off-site: Check the checkbox to indicate that mercury compounds are not stored off-site and disable the corresponding numerical input fields.
- During the calendar year XXXX, my company distributed into domestic commerce final products that may contain detectable amounts of a mercury compound as a result



of a manufacturing process to the following Industries of Distribution: check all that apply: Enter search criteria (North American Industry Classification System (NAICS) code, industry code) into the drop-down menu; as values are entered, the drop-down refines the available values according to the entered search terms. Check individual checkbox (es) to select the industry (ies) to which final products that may contain mercury compounds have been distributed by selecting the applicable NAICS code(s). Click the first value in a list and click the <Shift> key and then the last value in a list to select multiple consecutive values. Checked values display within the industries of distribution table. This is a required field if enabled.

- My company does not domestically distribute final products that may contain a mercury compound as a result of this manufacturing process: Check the checkbox to disable the 'Industry of Distribution' drop-down menu and corresponding table.
 - o **CBI:** Check the 'CBI' checkbox to claim the industry (ies) of distribution as confidential.
 - Refer to the NAICS Classification System to search for and enter the appropriate NAICS code: Click the link to generate the NAICS site in a separate browser tab if assistance is needed in searching for NAICS codes. Use the keyword search on the NAICS website (https://www.census.gov/eos/www/naics/index.html) to search for the desired industry.
 - Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the industries of distribution table.
 - **Search:** Enter search criteria to filter results from the displayed industries of distribution.
 - o **NAICS:** Displays the NAICS code of the selected industry of distribution.
 - o **Industry of Distribution:** Displays the selected industry of distribution.
 - o Action: Click the 'Delete' icon (✗) to remove a specific industry of distribution value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
 - Remove All: Click the 'Remove All' button to remove all values currently
 displayed in the table. A confirmation pop-up message displays to confirm the
 removal of all values; click the 'OK' button to remove or the 'Cancel' button to
 retain all values.
 - o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- During the calendar year XXXX, my company exported final products that may contain detectable amounts of a mercury compound as a result of a manufacturing process to the following country: *check all that apply*: Select the country (ies) of export to which the reporting company exported final products which may contain detectable amounts



of a mercury compound as a result of a manufacturing process during the specified year. At least one country is required to be selected if enabled.

- My company does not export final products that may contain mercury as a result of this manufacturing process: Check the checkbox to disable the 'Country of Export' drop-down menu and corresponding table.
 - o **CBI:** Check the 'CBI' checkbox to claim the destination country (ies) to which the reporting company exported final products as confidential.
 - Show entries: Select a value (10, 25, 50, or 100) from the drop-down menu to specify an exact number of entries that should display within the country of export table.
 - Search: Enter search criteria to filter results from the displayed country (ies) of export.
 - o **Country:** Displays the country to which the company exported final products.
 - O Action: Click the 'Delete' icon (▼) to remove a specific country of export value. A deletion confirmation pop-up message displays to confirm the removal of the value; click the 'OK' button to remove or the 'Cancel' button to retain the value.
 - Remove All: Click the 'Remove All' button to remove all values currently displayed in the table. A confirmation pop-up message displays to confirm the removal of all values; click the 'OK' button to remove or the 'Cancel' button to retain all values.
 - o **Previous/Next:** Click the 'Previous' or 'Next' button to navigate between the current set of entries that display.
- Additional Information: Enter plain text to provide any details/clarification of data.
- CBI: Check the 'CBI' checkbox to claim any additional information entered as confidential.



Exhibit 4-26 shows a screen capture of the 'Manufacturing Process (Compounds)' screen (Scroll 1):

Exhibit 4-26 Manufacturing Process (Compounds) Screen (Scroll 1)

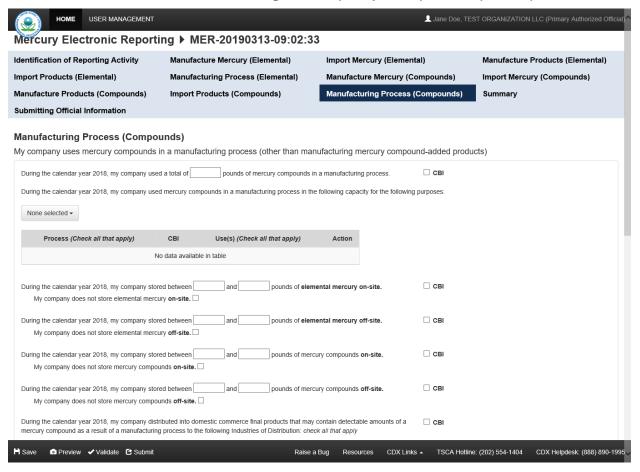




Exhibit 4-27 shows a screen capture of the 'Manufacturing Process (Compounds)' screen (Scroll 2):

Exhibit 4-27 Manufacturing Process (Compounds) Screen (Scroll 2)

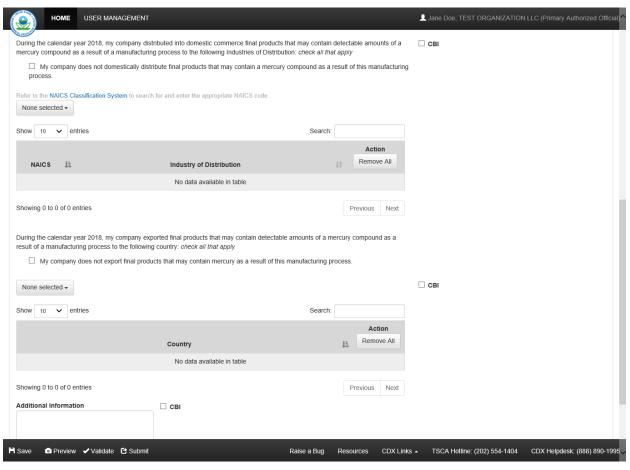




Exhibit 4-28 shows a screen capture of the 'Manufacturing Process (Compounds)' screen (Scroll 3):

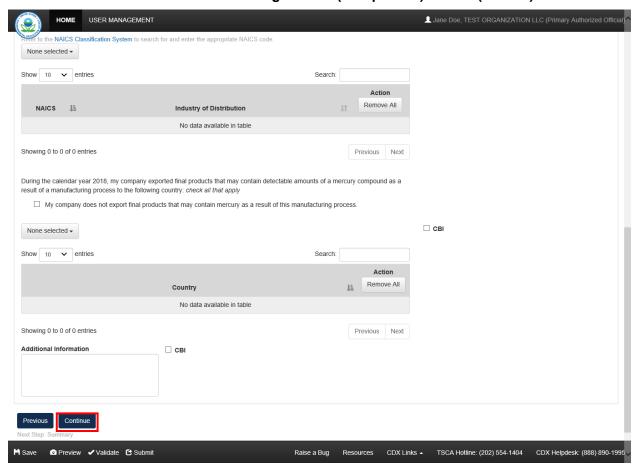


Exhibit 4-28 Manufacturing Process (Compounds) Screen (Scroll 3)

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 previous reporting activity 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 a MER form for the selected reporting activity (ies). Click the 'Expand' button corresponding to each section to view entered information and verify accuracy. The 'Expand All' and 'Collapse All' buttons may also be used to expand and collapse all sections, respectively.

- 1: My company manufactures (other than imports) elemental mercury: Click the 'Manufacture Mercury (Elemental)' link at the bottom of the section to navigate back to the original page to make any necessary edits.
- 2: My company imports elemental mercury to the United States: Click the 'Import Mercury (Elemental)' link at the bottom of the section to navigate back to the original page to make any necessary edits.



- 3: My company manufactures (other than imports) elemental mercury-added products: Click the 'Manufacture Products (Elemental)' link at the bottom of the section to navigate back to the original page to make any necessary edits.
- 4: My company imports elemental mercury-added products to the United States: Click the 'Import Products (Elemental)' link at the bottom of the section to navigate back to the original page to make any necessary edits.
- 5: My company uses elemental mercury in a manufacturing process (other than manufacturing mercury compounds and/or manufacturing elemental mercury-added products): Click the 'Manufacturing Process (Elemental)' link at the bottom of the section to navigate back to the original page to make any necessary edits.
- 6: My company manufactures (other than imports) mercury compounds: Click the 'Manufacture Mercury (Compounds)' link at the bottom of the section to navigate back to the original page to make any necessary edits.
- 7: My company imports mercury compounds to the United States: Click the 'Import Mercury (Compounds)' link at the bottom of the section to navigate back to the original page to make any necessary edits.
- 8: My company manufactures (other than imports) mercury compound-added products: Click the 'Manufacture Products (Compounds)' link at the bottom of the section to navigate back to the original page to make any necessary edits.
- 9: My company imports mercury compound-added products to the United States: Click the 'Import Products (Compounds)' link at the bottom of the section to navigate back to the original page to make any necessary edits.
- 10: My company uses mercury compounds in a manufacturing process (other than manufacturing mercury compound-added products): Click the 'Manufacturing Process (Compounds)' link at the bottom of the section to navigate back to the original page to make any necessary edits.



Exhibit 4-29 shows a screen capture of the 'Summary' screen (Scroll 1):

Exhibit 4-29 Summary Screen (Scroll 1)

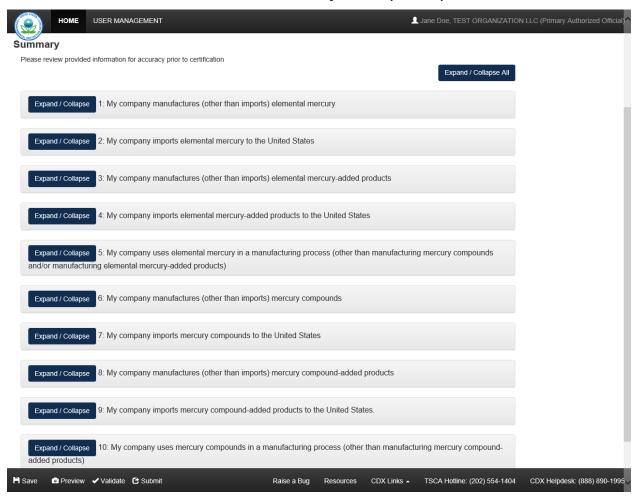
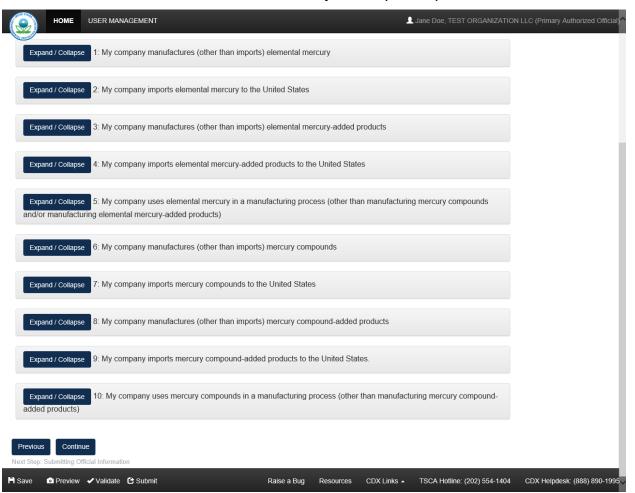




Exhibit 4-30 shows a screen capture of the 'Summary' screen (Scroll 2):

Exhibit 4-30 Summary Screen (Scroll 2)



Navigation: Click the 'Continue' button to navigate to the 'Submitting Official Information' screen.

4.14 Submitting Official Information

You can navigate to the 'Submitting Official Information' screen by clicking the 'Continue' button from the 'Summary' screen. You can also access this screen by clicking the 'Submitting Official Information' link within the navigation header.

The information below has been pre-populated from CDX registration. If the information listed is incorrect please make the appropriate edits to your user information in CDX registration.

- CBI: Check the 'CBI' checkbox to claim the submitter information as confidential.
- First Name: Displays the first name of the submitter.
- **Middle Initial:** Displays the middle initial of the submitter.
- Last Name: Displays the last name of the submitter.
- Company Name: Displays the company name of the submitter.



- **Phone Number:** Displays the phone number of the submitter.
- **Email Address:** Displays the email address of the submitter.
- Mailing Address 1: Displays line 1 of the mailing address of the submitter.
- City: Displays the city of the mailing address of the submitter.
- State: Displays the state of the mailing address of the submitter.
- Postal Code: Displays the postal code of the mailing address of the submitter.
- **Country:** Displays the country of the mailing address of the submitter.
- The technical contact has the same information as the submitting official: Check the checkbox to indicate that a technical contact is the same individual as the submitting official. Deselect the checkbox to enter a separate technical contact which enables the associated contact information fields.
- CBI: Check the 'CBI' checkbox to claim the technical contact information as confidential.
- First Name: Enter the first name of the technical contact. This is a required field.
- Middle Initial: Enter the middle initial of the technical contact.
- Last Name: Enter the last name of the technical contact. This is a required field.
- Company Name: Enter the company name of the technical contact. This is a required field.
- Phone Number: Enter the phone number of the technical contact. This is a required field.
- Email Address: Enter the email address of the technical contact. This is a required field.
- Mailing Address 1: Enter line 1 of the mailing address of the technical contact. This is a required field.
- Mailing Address 2: Enter line 2 of the mailing address of the technical contact.
- City: Enter the city of the mailing address of the technical contact. This is a required field.
- State: Select the state of the mailing address of the technical contact. This is a required field.
- **Postal Code:** Enter the postal code of the mailing address of the technical contact. This is a required field.
- Country: Displays 'United States.'
- This confirmation is required to proceed with the submission process: Check the checkbox to provide legal verification that you are the legally responsible party from the submitting company. This field is required to be checked but automatically deselects upon navigating out of the form.



Exhibit 4-31 shows a screen capture of the 'Submitting Official Information' screen (Scroll 1):

Exhibit 4-31 Submitting Official Information Screen (Scroll 1)

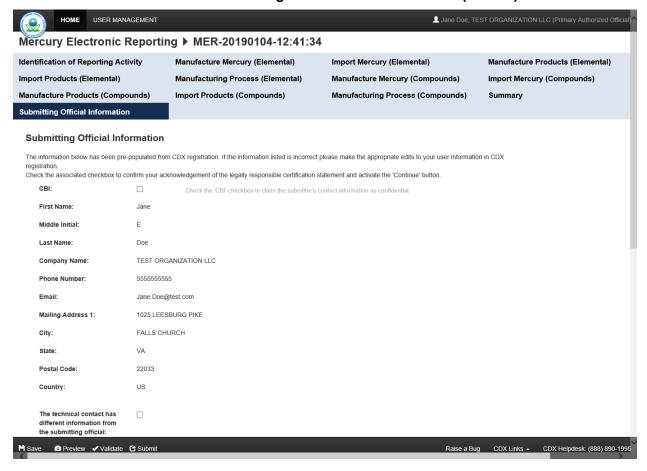
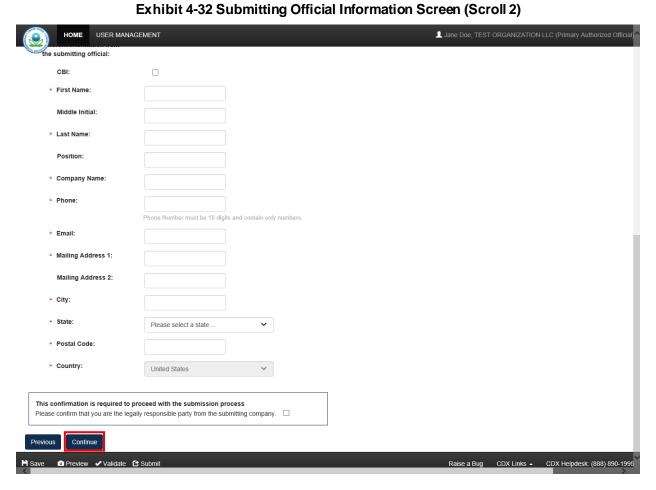




Exhibit 4-32 shows a screen capture of the 'Submitting Official Information' screen (Scroll 2):



Navigation: Click the 'Continue' button to navigate to the 'Instructions for Substantiating CBI Claims' screen if any claims of confidentiality were made in the form. If no CBI claims were made, click the 'Continue' button to begin the submission process. Refer to **Section 7** for more information on CBI substantiation.



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' (displays CBI) or the 'Sanitized' (redacts CBI) 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 5-1 shows a screen capture of the 'Preview' links:

Exhibit 5-1 Preview

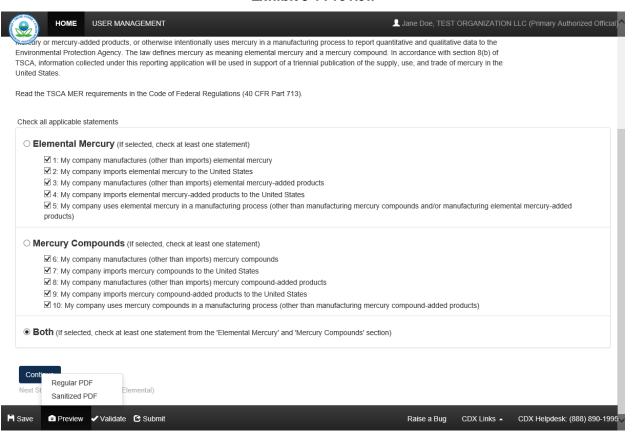




Exhibit 5-2 shows a screen capture for the 'Preview' of the MER form:

Exhibit 5-2 Preview MER Form PDF

NON-CBI SUBMISSION

MERCURY ELECTRONIC REPORTING								
Submission Date:			Revised Dat	e:				
Submitting Official Information								
Name of Authorized Official	(first)		(middle)		(last)		CBI:	Γ
Company Name		4	+	Position	-			
Email Address				Phone Numb	er 1	1		
Mailing Address 1				/	- G/V			
Mailing Address 2				-0/,	5			
City			State	1/11.	Postal Code			
Country			~111	Α,				
Technical Contact		5	5					
Name of Technical Contact	(first)	<0/	(middle)		(last)		CBI:	Γ
Company Name		4		Position				
Email Address	-10	15		Phone Numb	er			
Mailing Address 1	14.							
Mailing Address 2	*							
City			State		Postal Code			
Country								
My company manufactures (other than imports) elemental mercury								il .
My company report cycle.	ed amount o	f manufactured mer	cury in the m	ost recent Ch	nemical Data F	Reporting (CDR) rep	orting	
During the calendar year 2018, my company manufactured (other than imported) a total of pounds of elemental mercury.								\vdash
During the calendar year 2018, my company stored between and pounds of elemental mercury on-site . My company does not store elemental mercury on-site. □							Г	
During the calendar year 2018, my company stored between and pounds of elemental mercury off-site . My company does not store elemental mercury off-site. □							Г	
During the calendar year 2018, my company distributed pounds of elemental mercury into domestic commerce. My company does not distribute elemental mercury.								Г
My company domestically distributed elemental mercury to the following industry: check all that apply								Г
My company domes	stically distric	outea elemental me	reury to the it	ollowing indu	ou y. oneon an			+-
My company domes Additional Informat		outed elemental me	reary to the in	ollowing indu	sti y. check all			
	ion:		GUY	ollowing indu	stry. check all		СВ	I F
Additional Informat My company imports el	ion: emental mer		I States)··		rting (CDR) reporting		
Additional Informat My company imports el My company report	ion: emental mented amount o	rcury to the United	I States	ecent Chemic	al Data Repo	rting (CDR) reporting		
Additional Informat My company imports el My company report During the calendar	emental mented amount of great 2018, my	rcury to the United	in the most retotal of pounds	ecent Chemic	eal Data Repo	rting (CDR) reporting		
Additional Informat My company imports el My company report During the calendar y My company import During the calendar y	emental mental ded amount of year 2018, my ted elemental year 2018, my	rcury to the United f imported mercury company imported a t	in the most retotal of pounds	ecent Chemic of elemental r	eal Data Repoi mercury.			Г
Additional Informat My company imports el My company report During the calendar y My company import During the calendar y My company do During the calendar y	emental mental m	rcury to the United f imported mercury company imported a t I mercury from the f	in the most retotal of pounds following coursen and pound on-site.	ecent Chemic of elemental r ntry: check all ds of elementa	eal Data Report	ite.		Г
Additional Informat My company imports el My company report During the calendar y My company import During the calendar y My company do During the calendar y My company do During the calendar y My company do During the calendar y My company do	emental mer ted amount of year 2018, my ted elemental year 2018, my yes not store year 2018, my yes not store	rcury to the United f imported mercury company imported a t I mercury from the f company stored betw elemental mercury company stored betw	in the most retotal of pounds following coursen and pound on-site.	ecent Chemic of elemental r ntry: check all ds of elementa	al Data Reported in the control of t	ite.		Г Г

Page 1



6 Validate

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

Validation Errors: Errors can be fixed by clicking the error link. The links will display the *Screen Title Name* (e.g., Manufacture Mercury (Elemental)) 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 'MER Validation' window. If the information you fixed passes validation, the error will be removed from the 'MER Validation' window. You must fix all validation errors to submit the form to CDX successfully.

Warning Messages: Warnings are denoted by a 'Warning' icon () and can be fixed by clicking the warning link. The links will display the *Screen Title* and the associated warning. After you click a link, the main application screen will display the section where the warning occurred so you can easily fix the warning. Once you have fixed the warning(s), click the 'Validate' icon () again to refresh the 'MER Validation' window. If the information you fixed passes validation, the warning will be removed from the 'MER Validation' window. You can pass validation and continue to submit a form to CDX with active warning messages.

Click the 'X' button located at the upper right-hand corner of the window to close the 'MER Validation' window.

Exhibit 6-1 shows a screen capture for the 'MER Validation' window:

Exhibit 6-1 MER Validation Window

Mercury Electronic Reporting Validation × Validation Errors · Manufacture Mercury (Elemental) Total mercury value is required. Minimum range value is required Maximum range value is required Minimum range value is required · Maximum range value is required Distributed value is required · At least one Industry of Distribution is required. · Import Mercury (Elemental) · Total mercury value is required. · At least one Country of Origin is required. · Minimum range value is required · Maximum range value is required · Minimum range value is required Maximum range value is required



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 CBI Claims Screen

You can access the 'Instructions for Substantiating CBI Claims' screen by claiming information as CBI within a form and clicking the 'CBI Substantiation' link within the navigation header. The 'Instructions for Substantiating 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 optout 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 Reason: 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 Document for CBI Substantiation: Click the 'Attach Document for CBI Substantiation' 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. Only a single attachment may be uploaded per field; a regular attachment and if applicable, a CBI attachment. See Section 7.2 for additional information regarding how to attach a document.

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 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. Contact the TSCA Hotline (202) 554-1404.



Exhibit 7-1 shows a screen capture of the 'Instructions for Substantiating CBI Claims' screen (Scroll 1):

Exhibit 7-1 Instructions for Substantiating CBI Claims Screen (Scroll 1)





Exhibit 7-2 shows a screen capture of the 'Instructions for Substantiating CBI Claims' screen (Scroll 2):

Exhibit 7-2 Instructions for Substantiating CBI Claims Screen (Scroll 2)

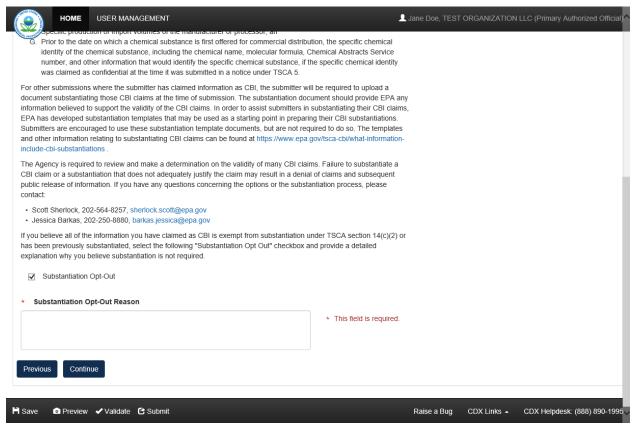
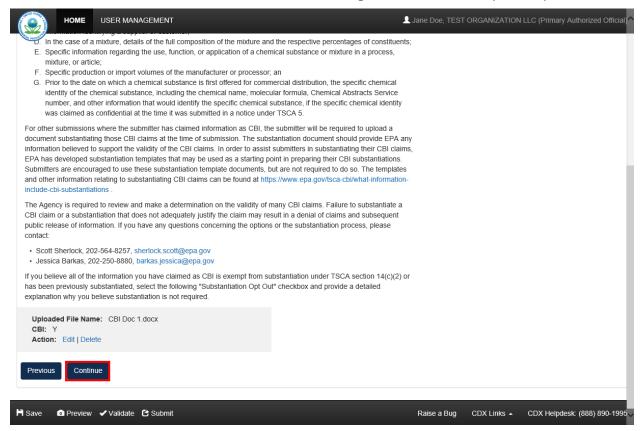




Exhibit 7-3 shows a screen capture of the 'Instructions for Substantiating CBI Claims' screen (Scroll 3):

Exhibit 7-3 Instructions for Substantiating CBI Claims Screen (Scroll 3)



Navigation: Click the 'Continue' button to navigate to the 'TSCA CBI Certification' screen and start the submission process. 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 Document for CBI Substantiation' link displays on the 'Instructions for Substantiating CBI Claims' screen, and provides functionality for you to attach supporting documents where needed. Click the 'Attach Document for CBI Substantiation' 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.



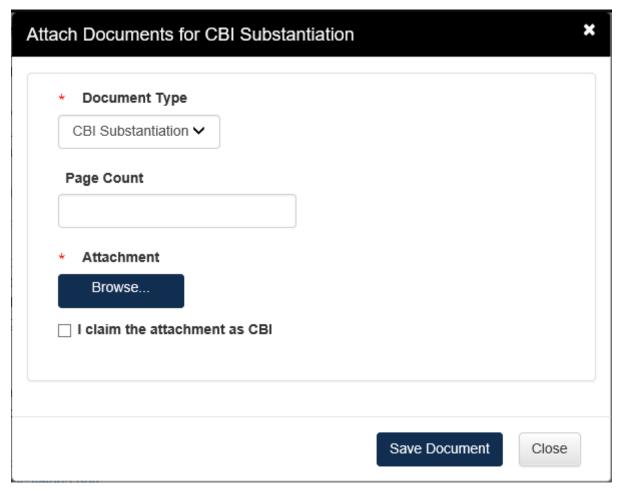
After you upload a document to be attached, the 'Attach Documents for CBI Substantiation' window will close and the document's information will display in a table format on the screen. Depending on the screen, the attachment table may display the section of the page with which the file is associated, the file name and file extension of the document, the number of pages in the document, and an indication 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.

- **Document Type:** Select 'CBI Substantiation' from the drop-down menu. 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. A user may attach one (1) regular attachment.
- Page Count: Enter the number of pages in a document.
- I claim the attachment as CBI: Check the 'I claim the attachment as CBI' checkbox to claim the attached document as confidential. Un-checking the 'I claim the attachment as 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. A user may attach a maximum of one (1) sanitized attachment.
- Close: Click the 'Close' button to cancel the 'Attach Documents' process.
- Save Document: Click the 'Save Document' 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 reattached and the missing field must be populated.



Exhibit 7-4 shows a screen capture of the 'Attach Documents for CBI Substantiation' window:

Exhibit 7-4 Attach Documents for CBI Substantiation Window



Navigation: Click the 'Close' button or 'X' icon in the upper right-hand corner to cancel the document attachment process. Click the 'Save Document' 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 U.S. Primary AO, you have the ability to sign and submit a MER form to EPA via CDX. You can save your form at any point during the data entry process. Any assigned Supports for your form cannot submit the MER form. Please also note that a non-U.S. Primary AO cannot access the MER application.

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

8.1 TSCA CBI Certification

Click the 'Start Submission Process' button from the 'Submitting Official Information' screen to access the 'TSCA CBI Certification' page.

"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."

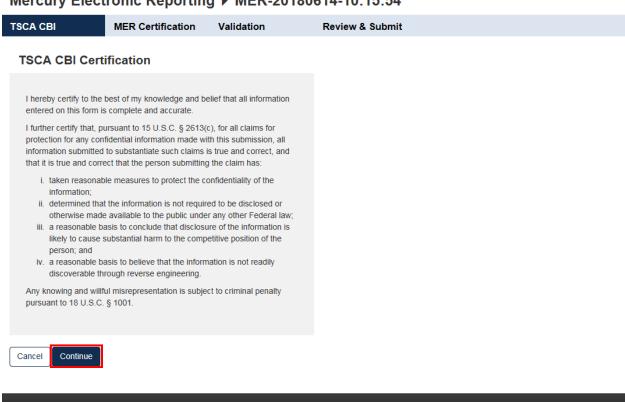


Exhibit 8-1 shows a screen capture of the 'TSCA CBI Certification' screen:

Exhibit 8-1 TSCA CBI Certification Screen



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



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

Navigation: Click the 'Continue' button to navigate to the 'MER Certification' screen. Click the 'Cancel' button to cancel the TSCA CBI Certification process and return to the MER 'Home' screen. A confirmation message will display to confirm cancelling the certification process. Click 'Ok' to cancel the submission or 'Cancel' to remain on the screen.

8.2 MER Certification

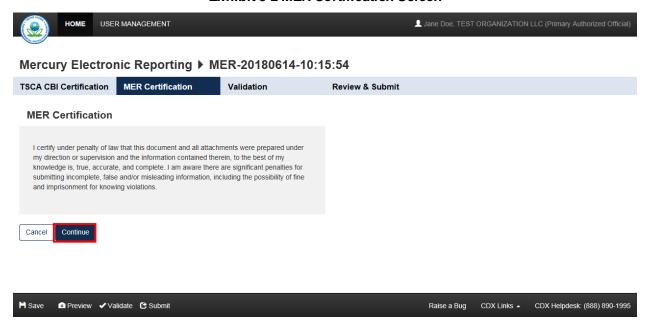
Click the 'Continue' button from the 'TSCA CBI Certification' screen to access the 'MER Certification' screen.

"I certify under penalty of law that this document was prepared under my direction or supervision and the information contained therein, to the best of my knowledge is, true, accurate, and complete. I am aware there are significant penalties for submitting incomplete, false and/or misleading information, including the possibility of fine and imprisonment for knowing violations."



Exhibit 8-2 shows a screen capture of the 'MER Certification' screen:

Exhibit 8-2 MER Certification Screen



Navigation: Click the 'Continue' button to navigate to the 'MER Validation' screen. Click the 'Cancel' button to stop the MER Certification process and return to the MER 'Home' screen. A confirmation message will display to confirm cancelling the certification process. Click 'Ok' to cancel the submission or 'Cancel' to remain on this screen.

8.3 MER Validation

Click the 'Continue' button from the 'MER Certification' screen to access the 'MER Validation' screen.

Exhibit 8-3 shows a screen capture of the 'Validation (Unsuccessful)' screen:

Validation Errors Found!

Sorry, your Mercury Electronic Reporting form contains validation errors and cannot be submitted now.

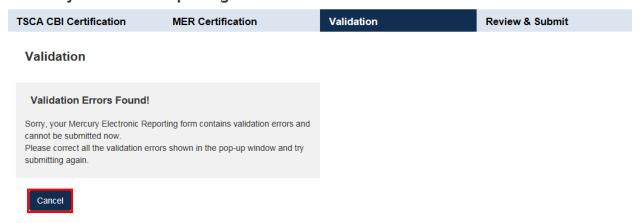
Please correct all the validation errors shown in the pop-up window and try submitting again.



Exhibit 8-3 Validation (Validation Errors Found) Screen



Mercury Electronic Reporting ▶ MER-20181107-14:25:58



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

Navigation: Click the 'Cancel' button to navigate back to the MER 'Home' screen or click a validation error link to navigate back to the page from which the error originates.

Exhibit 8-4 shows a screen capture of the 'Validation (No Validation Errors)' screen:

No Validation Errors!

Congratulations! Your Mercury Electronic Reporting form has passed the validation check. Please click the 'PDF Generation' button to continue the submission process.



Exhibit 8-4 Validation (No Validation Errors) Screen



Validation No Validation Errors! Congratulations! Your Mercury Electronic Reporting form has passed the validation check. Please click the 'PDF Generation' button to continue the submission process.

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

Navigation: Click the 'PDF Generation' button to navigate to the 'PDF Generation' screen. Click the 'Cancel' button to return to the MER 'Home' screen.

8.4 MER PDF Generation

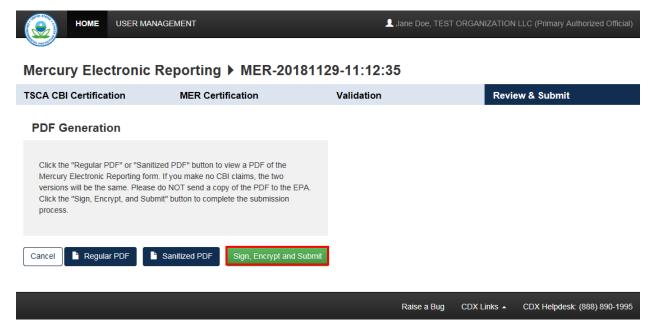
Click the 'PDF Generation' button from the 'MER Validation' screen to access the 'PDF Generation' screen.

"Click the 'Regular PDF' or 'Sanitized PDF' to view a PDF of the Mercury Electronic Reporting form. If you make no CBI claims, the two versions will be the same. Please do NOT send a copy of the PDF to the EPA. Click the 'Sign, Encrypt and Submit' button to complete the submission process."



Exhibit 8-5 shows a screen capture of the 'PDF Generation' screen:

Exhibit 8-5 PDF Generation Screen



Navigation: Click the 'Regular PDF' button to view the regular version (displays CBI) of the MER PDF in a separate window. Click the 'Sanitized PDF' button to view the sanitized version (redacts CBI) of the MER PDF. Click the 'Sign, Encrypt and Submit' button to begin the Cross-Media Electronic Reporting Regulation (CROMERR) certification process. Click the 'Cancel' button to stop the PDF generation process and return to the MER 'Home' screen.

8.5 CROMERR Certification

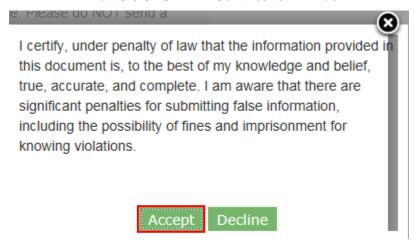
Click the 'Sign, Encrypt and Submit' button from the 'PDF Generation' screen to generate the 'CROMERR Certification' pop-up window.

"I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalites for submitting false information, including the possibility of fines and imprisonment for knowing violations."



Exhibit 8-6 shows a screen capture of the 'CROMERR Certification' window:

Exhibit 8-6 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 8-7 shows a screen capture of the 'eSignature Widget' window:

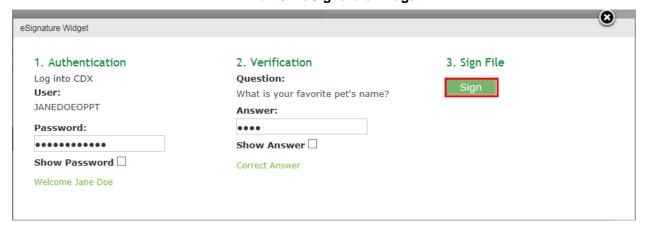


Exhibit 8-7 eSignature Widget

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

8.7 Submission Finished

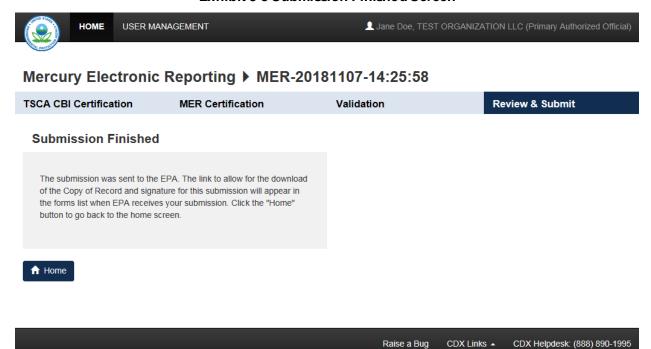
Click the 'Sign' button within the 'eSignature Widget' to navigate to the 'Submission Finished' screen.



"The submission was sent to the EPA. The link to allow for the download of the Copy of Record and signature for this submission will appear in the forms list when EPA receives your submission. Click the 'Home' button to go back to the home screen."

Exhibit 8-8 shows a screen capture of the 'Submission Finished' screen:

Exhibit 8-8 Submission Finished Screen



Navigation: Click the 'Home' button to confirm the submission of the form and navigate back to the MER 'Home' screen.



Download Copy of Record (CoR) 9

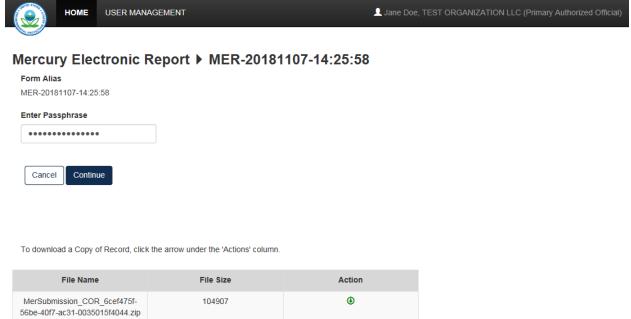
To download a CoR, navigate to the MER 'Home' screen and locate a form alias for which you have successfully completed a submission and which has a status of 'Completed'.

Click the 'Copy of Record' icon () from the 'Submission History' table of the MER '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 CoR .zip file generates on the current page.

If you do not remember the passphrase associated with the original submission, you will not be able to access the CoR.

Exhibit 9-1 shows a screen capture of the 'Download CoR' screen:

Exhibit 9-1 Download CoR Screen



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

The 'Download Copy of Record' screen displays 'File Name,' 'File Size,' and an 'Action' column in a table format. Click the 'Copy of Record' icon (19) to download the individual file (if applicable) uploaded during the submission process, a PDF version of the submission, and the XML version of the MER form. When you click the 'Copy of Record' icon ([●]), the system will allow you to view or download the individual files that were uploaded during the submission process.

After you click the 'CoR' icon, you have the option to open or save the CoR.



Exhibit 9-2 shows a screen capture of the 'Download Prompt (this may appear differently depending on the browser used):

Exhibit 9-2 Download Prompt



If you click the 'Copy of Record' icon (19) you will download:

- A regular and sanitized PDF version of the MER form.
- An XML version of the MER form.
- CBI substantiation attachments (if applicable).



10 Create an Amendment

The ability to unlock submissions to create an amendment is limited to six months after the submission deadline (July 1st after the reporting year) has passed. Contact EPA's help desk to amend a completed submission.

Exhibit 10-1 shows a screen capture of the MER 'Home' screen:

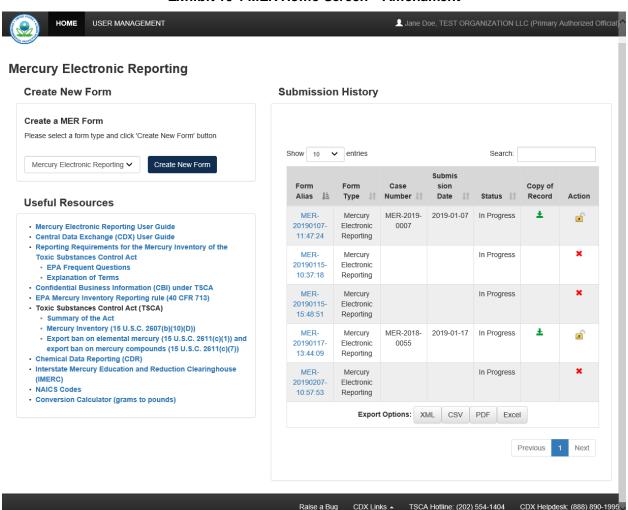


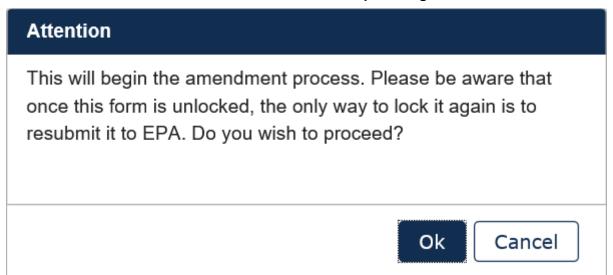
Exhibit 10-1 MER Home Screen - Amendment

Navigation: After clicking the 'Lock' icon (), a prompt will display to confirm the amendment process. If you do not want to continue with the amendment, click the 'Cancel' button to cancel the amendment process and return to the MER 'Home' screen. Click the 'OK' button to close the prompt and continue with the amendment.



Exhibit 10-2 shows a screen capture of the 'Unlock Prompt' message:

Exhibit 10-2 Unlock Prompt Message



After you click the 'OK' button, you will be taken to the 'Enter Passphrase' screen. You must enter the passphrase originally associated with the submission to start the amendment process. After you enter the passphrase and click the 'Next' button, you will be taken to the 'Identification of Reporting Activity' screen. Refer to **Section 3.7** for further instructions on the 'Enter Passphrase' screen.

After a submission has been unlocked, the MER 'Home' screen will display a status of 'In Progress' under the 'Status' column, and the 'Unlocked' icon () will display under the 'Action' column; however, you will not see these changes until you navigate back to the MER 'Home' screen.



11 Resources

This section describes the links within the 'Resources' list and other resources within the MER application.

11.1 Helpdesk and Hotline Information

The following resources are available if there is an issue with a user's CDX account, or general questions regarding TSCA.

- TSCA Hotline: Call (202) 554-1404 for questions regarding TSCA.
- CDX Helpdesk: Call (888) 890-1995 if there is an issue regarding your TSCA account (forgotten password, etc.).

11.2 Resources Links

The following resources are available within the 'Resources' list for additional information regarding the Mercury Inventory Reporting rule.

The 'Resources' list displays the following links:

- Mercury Electronic Reporting User Guide: Click the link to display the MER user guide for a PAO in a separate browser tab.
- Central Data Exchange (CDX) User Guide: TBD.
- Reporting Requirements for the Mercury Inventory of the Toxic Substances Control Act: TBD Link.
 - **EPA Frequent Questions:** In progress/TBD link.
 - o **Explanation of Terms:** In progress/TBD link.
- Confidential Business Information (CBI) under TSCA: Click the link to generate the 'Confidential Business Information under TSCA' page in a separate tab to learn about the CBI provisions of TSCA.
- **EPA Mercury Inventory Reporting rule (40 CFR 713):** Click the link to generate Part 713 of the Code of Federal Regulations (CFR) in a separate tab.
- Toxic Substances Control Act: Click the subsequent links for additional information regarding TSCA.
 - Summary of the Act: Click the link to generate the 'Summary of the Toxic Substances Control Act' page in a separate browser tab.
 - Mercury Inventory (15 U.S.C. 2607(b)(10)(D)): Click the link to generate Title 15, Chapter 53, Subchapter 2607 of the United States Code regarding reporting and retention of information in a separate browser tab.
 - Export ban on elemental mercury (15 U.S.C. 2611(c)(1)) and export ban on mercury compounds (15 U.S.C. 2611(c)(7)): Click the link to generate Title 15, Chapter 53, Subchapter 2611 of the United States Code regarding exports in a separate browser tab.
- Chemical Data Reporting: Click the link to generate the 'CDR under TSCA' page in a separate browser tab.



- Interstate Mercury Education and Reduction Clearinghouse (IMERC): Click the link to generate the 'IMERC' page in a separate browser tab.
- NAICS Codes: Click the link to generate the 'NAICS' page in a separate browser tab; this page allows you to search for a specific code by keyword or digit.
- Conversion Calculator (grams to pounds): TBD link.