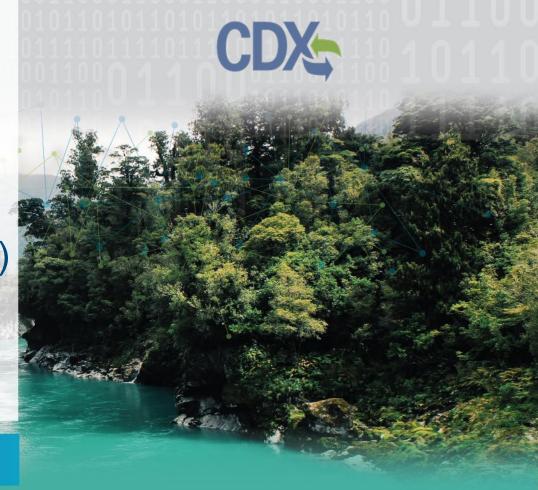
Environmental Protection Agency

Office of Chemical Safety and Pollution Prevention (OCSPP)

Office of Pollution
Prevention and Toxics

January 24, 2022



OPPT CIS TSCA Section 8(a) Asbestos

Section 8(a) Asbestos Home Page PRA CDX

OMB Control No. 2070-NEW Expires xx/xx/xxxx



HOME USER MANAGEMENT

L Carolina Falaiye, Mary Kay (Primary Authorized Official)

0

Section 8(a) Asbestos

Welcome to the Section 8(a) Asbestos application. Create an Asbestos report under TSCA Section 8(a) Asbestos by clicking the Create New Form button. Once the form has been created, select the form to modify the form. After the form is submitted, a licon indicates that the submission is being processed. When the form is received by EPA, the licon allows a user to download a copy of the submission.

To manage the access rights of Supports per site, the Authorized Official may assign the forms via the User Management tab.

Paperwork Reduction Act

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-NEW). Responses to this collection of information are mandatory for certain persons, as specified at 40 CFR 704. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be XX hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Form B EPA No. 9600-042

Section 8(a) Asbestos Home Page





▲ Carolina Falaiye, Mary Kay (Primary Authorized Official)

0

Section 8(a) Asbestos

Welcome to the Section 8(a) Asbestos application. Create an Asbestos report under TSCA Section 8(a) Asbestos by clicking the Create New Form button. Once the form has been created, select the select the form to modify the form. After the form is submitted, a lace icon indicates that the submission is being processed. When the form is received by EPA, the select indicates that the submission.

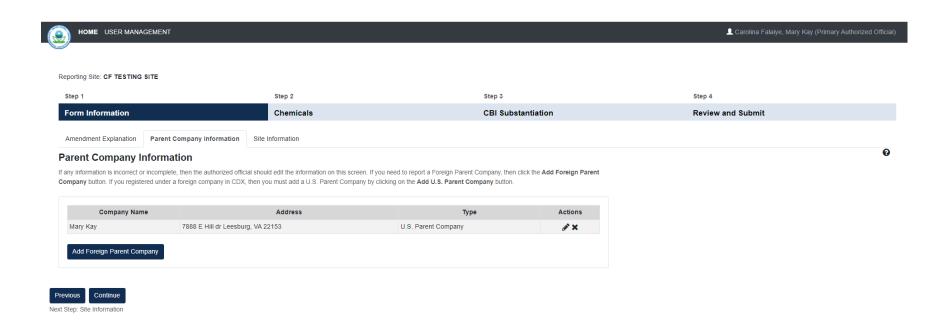
To manage the access rights of Supports per site, the Authorized Official may assign the forms via the User Management tab.

Manage Forms Show 10 ✓ entries Search: Case Number Status **Last Modified Date Submission Date** Actions SPECIALTY TIRES OF AMERICA INC 8AAsbestos-22-0001 2020-10-16 15:10:75 2020-05-18 09:05:00 In Progress **№** 🔐 🕹 1600 WASHINGTON STREET INDIANA, PA 15701-2893 SHELL SERVICE STATION Not Assigned Not Started Create New Form 9885 E HILL DR LORTON, VA 22079 **REVIVE OILY CO** Not Assigned In Progress 2020-11-17 17:11:80 2020-08-25 16:08:66 4960 ALLIANCE DR FAIRFAX, VA 22030 MY TESTING FACILITY Not Assigned Not Started Create New Form 7709 DURER CT SPRINGFIELD, VA 22153 MANUFACTURING INFO CO CDR-2020-00062 Completed 2020-06-03 08:06:14 2020-06-03 07:06:84 9895 E HILL DR LORTON, VA 22079 LEDVANCE LLC CDR-2020-00161 Completed 2021-02-24 09:02:23 2021-02-24 09:02:02 835 WASHINGTON RD SAINT MARYS, PA 15857 ⊠ 🚣

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

Parent Company Information





Confirm Parent Company Information CDX



| HOME USER MANAGEN | MENT | | ▲ Carolina Falaiye, Mary Kay (Primary Authorized Official) |
|--------------------------------|--------------------------------|---|---|
| Parent Company Information | Site Information Technical Con | act Information | |
| Parent Company Info | ormation | | 0 |
| | | uld edit the information on this screen. If you need to report a Foreign Parent Comp mpany in CDX, then you must add a U.S. Parent Company by clicking on the Add t | |
| Company Type | | U.S. Parent Company | |
| Company Name | | Mary Kay | |
| Company Dun & Bradstreet No | umber 0 | 45-454-5454 | |
| Company Address | | 7888 E Hill dr | |
| Company Address 2 | | | |
| City | | Leesburg | |
| County/Parish | | Loundon | |
| State/Province/Other | | Virginia x + | |
| Zip Code | | 22153 | |
| Country | | UNITED STATES * | |
| Save Cancel Previous Continue | | | |
| H Save ☐ Preview ✓ Validate ☐ | Submit | | CDX Links • CDX Helpdesk: (888) 890-1995 TSCA Hotline: (202) 554-1404 |

Technical Contact Information



| Copy Information from CDX Registration | | |
|--|------------------|-----|
| Prefix | Select an option | |
| First Name | | |
| Middle Initial | | |
| Last Name | | |
| Suffix | Select an option | |
| Company Information | | |
| Company Name | | |
| Telephone | | Ext |
| Email Address | | |
| Mailing Address 1 | | |
| Mailing Address 2 | | |
| City | | |
| State | Select an option | |
| Zip Code | | |
| | | |
| | | |

Site Information



| Site Information | | | | | | |
|---|-----------------|--------------------|-------------------------|------------|--|--|
| | | | | | | |
| EPA Registry ID | | | | | | |
| Site Name | | | | | | |
| Dunn and Bradstreet Number | | | | | | |
| Site Mailing Address | | | | | | |
| Site Mailing Address 2 | | | | | | |
| City | | | | | | |
| County/Parish | | | | | | |
| State/Province/Other | | | | | | |
| Zip Code | | | | | | |
| ☐ Physical Address is different than N | 1ailing Address | | | | | |
| Total Number of Employees at Site | Select | | | | | |
| North American Industry Classification System (NAICS) Code See NAICS Description Provide at least 1 NAICS code and the cooresponding activity classification (Manufacture, Import or Both) for each code. You can add up to 3 codes by selecting the Add NAICS Code button below. | | | | | | |
| | NAICS Code | †I | Activity Classification | ↑↓ Actions | | |
| | No data | available in table | | | | |
| Add NAICS C | ode | | | | | |
| Showing 0 to 0 of | 0 entries | | | | | |

Respondent Activity - Full Page



| (0) | HOME USER MANAGEMENT | | | 🗘 Carolina Falaiye, Mary Kay (Primary Authoriz | ed Official) |
|-------|---|-----------------|--------------------|---|--------------|
| 000 | | | | | |
| Re | eporting Site: SPECIALTY TIRES OF AMERICA INC | | | | |
| | Step 1 | Step 2 | Step 3 | Step 4 | |
| | Form Information | Asbestos Fibers | CBI Substantiation | Review and Submit | |
| | | | | | |
| | | | | | 0 |
| | Respondent Identification | | | | |
| | ☐ Mine and Mill ☐ Primary Processor ☐ Importers of Bulk Asbestos ☐ Secondary Processor ☐ Importer of Asbests Mixtures ☐ Importer of Article(s) Containing Asbestos Component5 | | | | |
| Pre | vious Continue | | | | |
| H Sav | ve ☐ Preview Validate Submit | | CDX L | inks - CDX Helpdesk: (888) 890-1995 TSCA Hotline: (20 | 2) 554-1404 |

Respondent Activity



Reporting Commercial and Industrial Uses of Asbestos

[Directions] Lorem ipsum dolor sit amet, consectetur adipiscing elit. Aenean euismod bibendum laoreet. Proin gravida dolor sit amet lacus accumsan et viverra justo commodo. Proin sodales pulvinar tempor. Cum sociis natoque penatibus et

| Activities [A2] | | | | | |
|---|--|--|--|--|--|
| Select all that apply. | Are you aware of the amount of Asbestos in your product? | | | | |
| ✓ Mine and Mill | ☐Yes ✓ No | | | | |
| Primary Processor | | | | | |
| ✓ Importers of Bulk Asbestos | ✓ Yes | | | | |
| Secondary Processor | | | | | |
| Importer of Asbestos Mixtures | | | | | |
| Importer of article(s) containing asbestos component(s) | | | | | |
| | | | | | |
| Continue | | | | | |

Mined or Milled – Form A

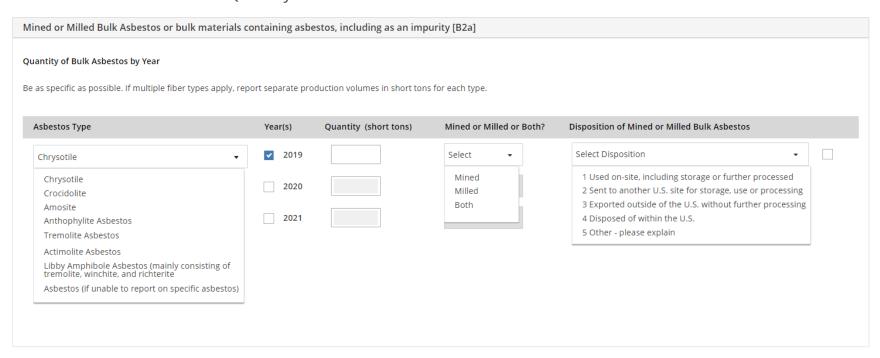


| ext Step: | |
|--|---|
| Mined or Milled Bulk Asbestos, or Bulk N | Materials Containing Asbestos, Including as an Impurity |
| Select all that apply. | |
| | |
| Bulk Asbestos | |
| Bulk Materials Containing Asbestos, includi | ing as an impurity |
| Number of Employees Involved with Mining | |
| Select | |
| | |
| Number of Employees Involved with Milling | |
| Select | |
| Is Personal Protective Equipment (PPE) Used? | |
| ⊚ Yes ○ No | |
| What Type of PPE is used? | |
| | |
| | |
| | |
| Cardinus | |
| Continue | |





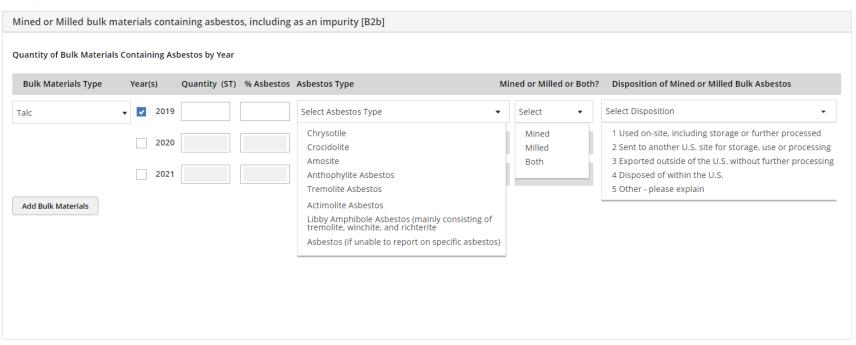
Production of Bulk Asbestos: Quantity of Bulk Asbestos Mined or Milled





Quantity of Bulk Materials Mined or Milled – Form B

Next Step:





Mined or Milled: Test Results - Yes

Next Step:

| Mined or Milled Bulk Asbestos or bulk materials containing asbestos, including as an impurity [B2bii] |
|---|
| Have you tested or received test results regarding your bulk material for asbestos in the applicable reporting years? |
| With what frequency do you conduct testing on the presence of asbestos in your bulk material? |
| Method of determining asbestos content |
| Type of test? |
| Test results |

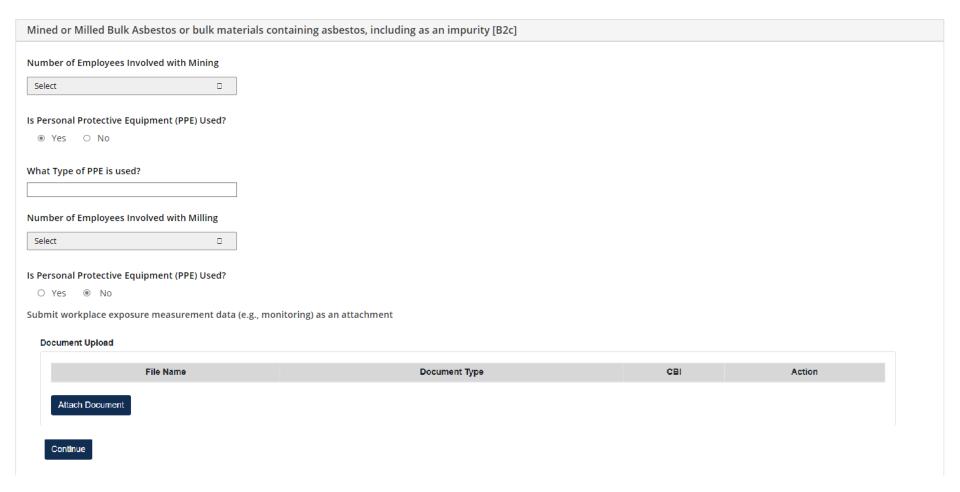


Mined or Milled: Test Results - No

Next Step:

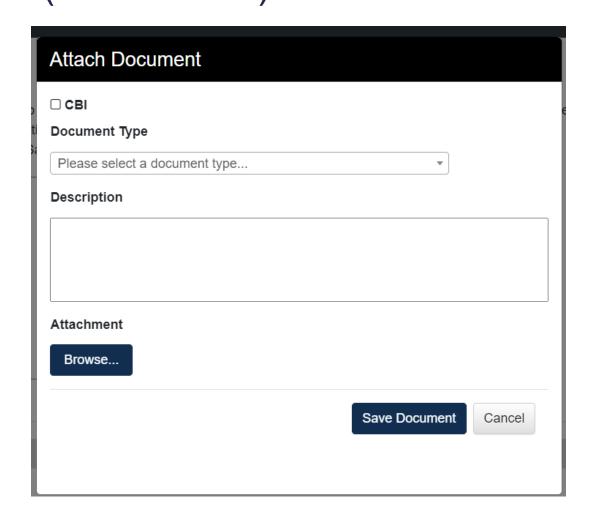
| Mined or Milled Bulk Asbestos or bulk materials containing asbestos, including as an impurity [B2bii] |
|---|
| Have you tested or received test results regarding your bulk material for asbestos in the applicable reporting years? O Yes O No |
| How do you know the presence and amount of asbestos? |
| |
| |
| |
| |
| |
| |

Mined or Milled: Employee Involvement CDX – Form B



Mined or Milled: Employee Involvement CDX – Form B (Attachment)





Importers of Bulk Asbestos – Form A

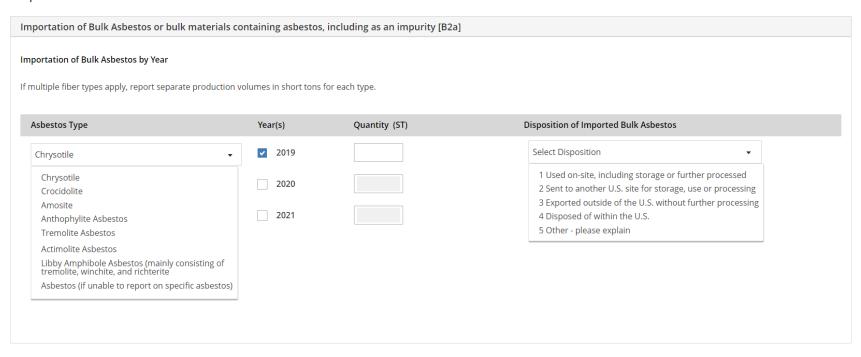


Importers of Bulk Asbestos, or Bulk Materials Containing Asbestos, Including as an Impurity Select all that apply. **Bulk Asbestos** Bulk Materials Containing Asbestos, including as an impurity Number of Employees Involved with Importing Select Is Personal Protective Equipment (PPE) Used? Yes O No What Type of PPE is used?

Importers of Bulk Asbestos – Form B



Importers of Bulk Asbestos: Form B



Importers of Bulk Asbestos – Form B



| Importation of Bulk Materials Containing Asbestos by Year | | | | | | |
|---|--------|-----------------|------------|--|---|--|
| Bulk Materials Type | Year(s |) Quantity (ST) | % Asbestos | Asbestos Type | Disposition of Mined or Milled Bulk Asbestos | |
| Talc | · V | 2019 | | Select Asbestos Type ▼ | Select Disposition ▼ | |
| Talc Vermiculite Sand | | 2020 | | Chrysotile Crocidolite Amosite | 1 Used on-site, including storage or further processed 2 Sent to another U.S. site for storage, use or processing 3 Exported outside of the U.S. without further processing | |
| Other | | 2021 | | Anthophylite Asbestos Tremolite Asbestos | 4 Disposed of within the U.S. 5 Other - please explain | |
| Add Bulk Materials | | | | Actimolite Asbestos Libby Amphibole Asbestos (mainly consisting of tremolite, winchite, and richterite Asbestos (if unable to report on specific asbestos) | | |

Importers of Bulk Asbestos: Test Results - Yes



| Importation of Bulk Asbestos or bulk materials containing asbestos, including as an impurity [B2bii] |
|--|
| Have you tested or received test results regarding your bulk material for asbestos in the applicable reporting years? Yes O No |
| With what frequency do you conduct testing on the presence of asbestos in your bulk material? |
| |
| Method of determining asbestos content |
| |
| Type of test? |
| |
| Test results |
| |

Importers of Bulk Asbestos: Test Results - No



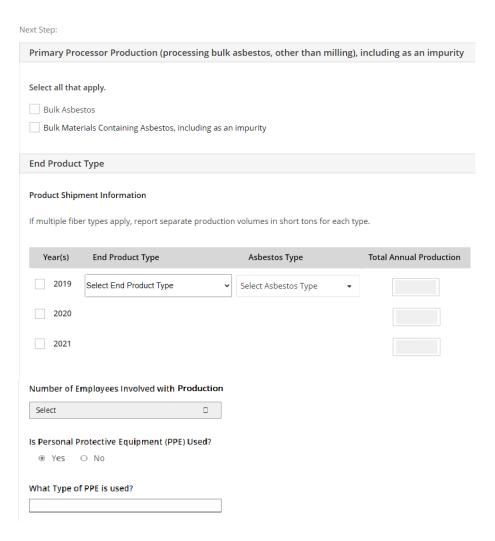
| Importation of Bulk Asbestos or bulk materials containing asbestos, including as an impurity [B2bii] |
|--|
| Have you tested or received test results regarding your bulk material for asbestos in the applicable reporting years O Yes No |
| How do you know the presence and amount of asbestos? |

Importers of Bulk Asbestos: Employee Involvement – Form B



| Importation of Bulk Asbestos or bulk materials containing asbestos, including as an impurity [B2c] | | | | | | |
|--|---------------|-----|--------|--|--|--|
| Number of Employees Involved with Importing Select | | | | | | |
| Is Personal Protective Equipment (PPE) Used? | | | | | | |
| | | | | | | |
| What Type of PPE is used? | | | | | | |
| Submit workplace exposure measurement data (e.g., monitoring) as an attachment | | | | | | |
| Document Upload | | | | | | |
| File Name | Document Type | CBI | Action | | | |
| Attach Document | | | | | | |

Primary Processor Production - Form A CDX



Primary Processor Production - Form B CDX

| Primary Processor Production | (processing bulk asbestos, other | than milling), i | ncluding as an imp | urity | | |
|---|--|-------------------|--------------------|-------------------------|------------|---|
| , | , | 0,, | , | , | | |
| Select all that apply. | | | | | | |
| Bulk Asbestos | | | | | | |
| Bulk Materials Containing Asbe | stos, including as an impurity | | | | | |
| | | | | | | |
| End Product Type | | | | | | |
| Product Shipment Information If multiple fiber types apply, report | separate production volumes in short | tons for each typ | e. | | | |
| | | | | | | |
| End Product Type | Asbestos Type | Year(s) | Quantity Processed | Total Annual Production | % Asbestos | Disposition of End Product |
| End Product Type Select End Product Type | Asbestos Type ✓ Select Asbestos Type ✓ | Year(s) 2019 | Quantity Processed | Total Annual Production | % Asbestos | Disposition of End Product Select Disposition |
| | | | Quantity Processed | Total Annual Production | % Asbestos | |

Primary Processor Production: Employee Involvement - Form B

Continue



| Primary Processor Production (processing bulk asbestos, other than milling), including as an impurity | | | |
|--|---------------------------------|-----|--------|
| Number of Employees Involved with Production Select Is Personal Protective Equipment (PPE) Used? Yes O No | | | |
| What Type of PPE is used? | | | |
| Submit workplace exposure measurement data (e.g | ,, monitoring) as an attachment | | |
| File Name | Document Type | СВІ | Action |
| Attach Document | | | |

25

Secondary Processor Production - Form A



| Secondary Processor Production (pro | cessing mixtures and articles containing asbes | tos, including as in | impurities) |
|--|---|----------------------|-------------------------|
| | | | |
| Select all that apply. | | | |
| Bulk Asbestos | | | |
| Bulk Materials Containing Asbestos, inc | luding as an impurity | | |
| | | | |
| End Product Information | | | |
| If multiple fiber types apply, report separate | e production volumes in short tons for each type. | | |
| End Product Type | Asbestos Type | Year(s) | Total Annual Production |
| Select End Product Type | Select Asbestos Type ▼ | 2019 | |
| | | 2020 | |
| | | 2021 | |
| | | | |
| | | | |
| Number of Employees Involved with Seco | ndary processing of asbestos | | |
| Select | | | |
| 23.33 | - | | |
| Is Personal Protective Equipment (PPE) Us | sed? | | |
| ○ Yes ● No | | | |
| | | | |

Secondary Processor Production - Form B



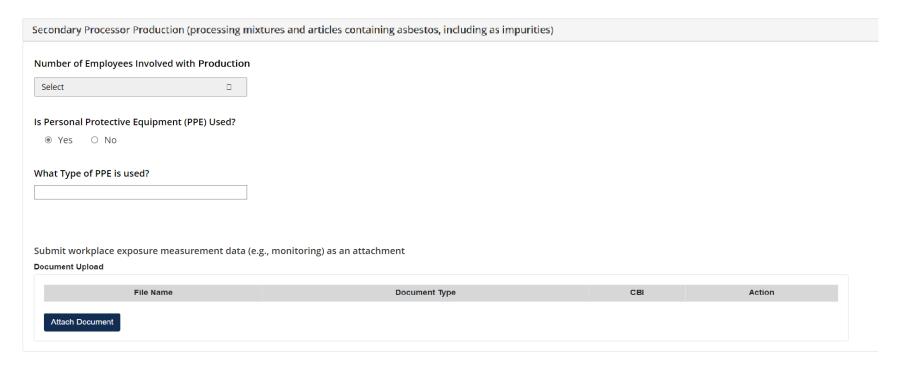
| Secondary Processor Pro | Secondary Processor Production (processing mixtures and articles containing asbestos, including as impurities) | | | | | | |
|--|--|----------|----------------------|--------------------------|-------------|-----------------------|----------------------------|
| Estimated Total Annual Pro | Estimated Total Annual Production of Asbestos by Year | | | | | | |
| If multiple fiber types apply, report separate production volumes in short tons for each type. | | | | | | | |
| Select all that apply. | | | | | | | |
| Bulk Asbestos | | | | | | | |
| Bulk Materials Containi | ng Asbestos, including as an | impurity | | | | | |
| | | | | | | | |
| End Product Type | | | | | | | |
| Product Shipment Information | | | | | | | |
| If multiple fiber types apply, report separate production volumes in short tons for each type. | | | | | | | |
| End Product Type | Asbestos Type | Year(s) | Quantity Processed | Total Annual Production | % Asbestos | Function of Asbestos | Disposition of End Product |
| End Froduct Type | Assestes Type | Tear(3) | Qualities 1 10cc55cu | Total Affidal Froduction | 70 ASDESCOS | runction of 7555cstcs | Disposition of End Froduct |
| Select End Product Type 🗸 | Select Asbestos Type ▼ | 2019 | | | | Select Function | Select Disposition |
| | | 2020 | | | | Select Function | Select Disposition |
| | | 2021 | | | | Select Function | Select Disposition |

Secondary Processor Production - Test CDX Results



| Secondary Processor Production (processing mixtures and articles containing asbestos, including as impurities) |
|---|
| f as impurity, have you tested or received test results regarding the presence of asbestos in the applicable reporting years? |
| ● Yes ○ No |
| With what frequency do you conduct testing on the presence of asbestos in your products? |
| Type of test? |
| |
| Test results |
| |

Secondary Processor Production: Employee CDX Involvement - Form B



Importers of Products (Mixtures and Articles) – Form A



| Importation of Products (N | Mixtures an | d Articles) that Co | ntain Asbestos, inc | luding as an impurity |
|---|---------------|---------------------|---------------------|-----------------------|
| Importation of Products by Ye | ear | | | |
| Imported Product Type | Year(s) | Mixture/Article? | Quantity (ST) | |
| Select Product Type ▼ | 2019 | Select one 🗸 | | |
| | 2020 | | | |
| | 2021 | | | |
| Add Product | | | | |
| Number of Employees Involve | ed with Impo | rting | | |
| Select | | | | |
| Is Personal Protective Equipm Yes O No | nent (PPE) Us | ed? | | |
| G 163 O 110 | | | | |
| What Type of PPE is used? | | | | |
| | | | | |
| Continue | | | | |

Importers of Products (Mixtures and Articles) – Form B



| Importation of Products (Mixtures and Articles) that Contain Asbestos, including as an impurity | | | | | |
|---|--------------------|--------------------|------------|--------------------------|---------------------------------|
| Importation of Products by Year | | | | | |
| Imported Product Type Year(|) Mixture/Article? | Est. Quantity (ST) | % Asbestos | Asbestos Type | Disposition of Imported Product |
| Select Product Type ▼ 20 | Select one | | | Select Asbestos Type ▼ | Select Disposition ▼ |
| 20 | 20 | | | Select Asbestos Type ▼ | Select Disposition |
| 20 | 21 | | | Select Asbestos Type ▼ | Select Disposition |
| Add Product | | | | | |

Importers of Products (Mixtures and Articles): Employee Involvement – Form B



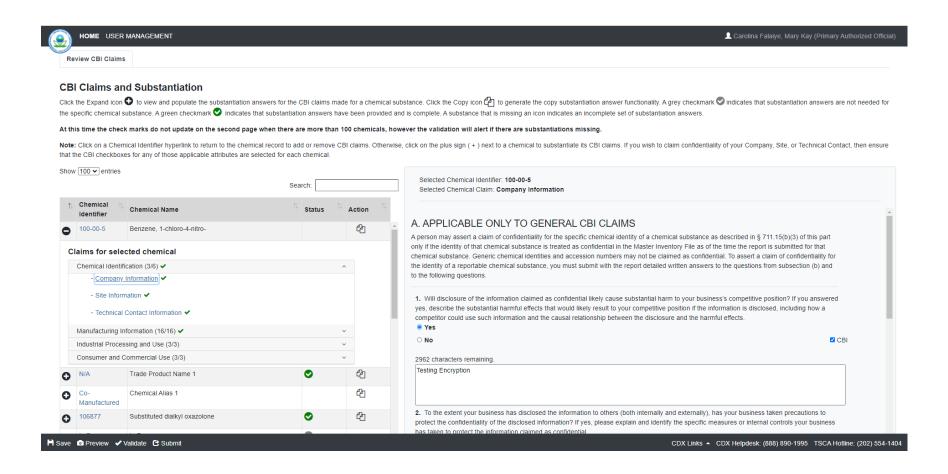
Importers of Products (Mixtures and Articles): Test Results



| Importation of Products (Mixtures and Articles) that Contain Asbestos, including as an impurity |
|---|
| |
| Have you tested or received test results regarding your product for asbestos in the applicable reporting years? |
| |
| |
| With what frequency do you conduct testing on the presence of asbestos in your products? |
| |
| Type of test? |
| |
| |
| Test results |
| |
| |

CBI Claims Substantiation





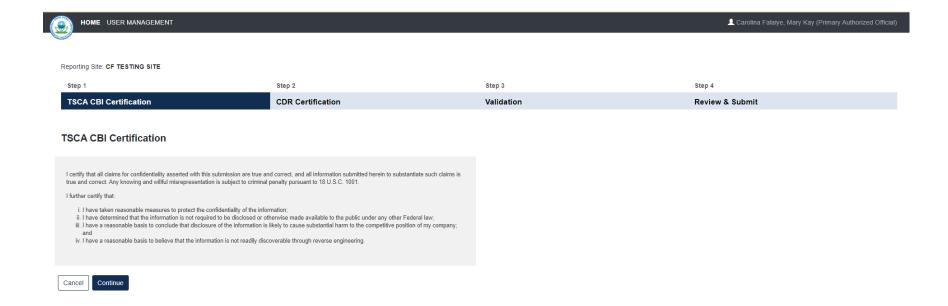
Submitting Official Information



| HOME USER MANAGEMENT | | ■ Carolina Falaiye, Mary Kay (Primary Authorized Official) |
|--|--|---|
| Submitting Official Information | | |
| Submitting Official Information | | |
| The information below has been pre-populated from CDX registration. If the listed information the legally responsible certification statement and activate the Start Submission Process by | n is incorrect, then please make the appropriate edits to your user information in CDX registration. Check the associated che utton. | eckbox to confirm your acknowledgement of |
| СВІ | Check the 'CBI' checkbox to claim the submitter's contact information as confidential. | |
| First Name: | Carolina | |
| Last Name: | Falaiye | |
| Company Name: | Mary Kay | |
| Position: | President | |
| Phone Number: | 7032276159 | |
| Email: | carolina.falaiye@cgifederal.com | |
| Mailing Address 1: | 7888 E Hill dr | |
| City: | Leesburg | |
| State: | VA | |
| Postal Code: | 22153 | |
| Country: | US | |
| | | * |
| A. APPLICABLE ONLY TO GENERAL CBI CLAIMS | | |
| confidential in the Master Inventory File as of the time the report is submitted for that chem | al substance as described in § 711.15(b)(3) of this part only if the identity of that chemical substance is treated as ical substance. Generic chemical identities and accession numbers may not be claimed as confidential. To assert a with the report detailed written answers to the questions from subsection (b) and to the following questions. | |
| The state of the s | to your business's competitive position? If you answered yes, describe the substantial harmful effects that would likely tor could use such information and the causal relationship between the disclosure and the harmful effects. | |
| □ Sava | CDV | Links + CDV Helpdeck: (999) 990 1995 TSCA Hotline: (202) 554 1404 |

TSCA CBI Certification

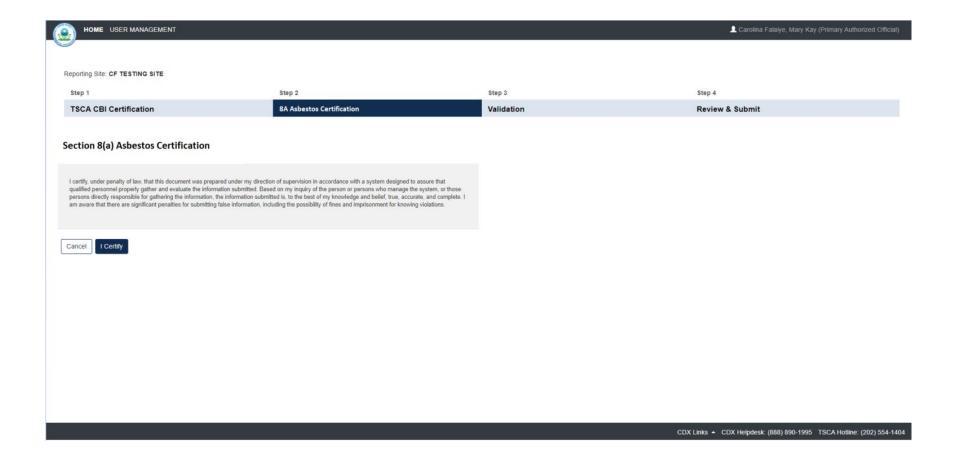




CDX Links - CDX Helpdesk: (888) 890-1995 TSCA Hotline: (202) 554-1404

Section 8(a) Asbestos Certification







| Step 1 | | Step 2 |
|---|-----------------------|--|
| Communication Information | | Review and Submit |
| Submitting Official Information | | |
| Submitting Official Information | | |
| The information below has been pre-populated from CDX registration. If the listed information is in certification statement and activate the Continue button. | ncorrect, then please | make the appropriate edits to your user information in CDX registration. |
| CBI | | Check the 'CBI' checkbox to claim the submitter's contact infor |
| First Name: | William | |
| Last Name: | Brigman | |
| Company Name: | CGI FEDERA | L TEST 1 |
| Phone Number: | 8289191634 | |
| Email: | william.brigma | an@cgifederal.com |
| Mailing Address 1: | 12601 FAIR L | AKES CIRCLE |
| City: | FAIRFAX | |
| State: | VA | |
| Postal Code: | 22033 | |
| Country: | US | |
| This confirmation is required to proceed with the submission process Please confirm that you are the legally responsible party from the submitting company. | | |
| Previous Continue | • | |



| HOME USER MANAGEMENT | ' | |
|---|--------|-------------------|
| Step 1 | | Step 2 |
| Communication Information | | Review and Submit |
| Submitting Official Information CBI Substanti | iation | |

Instructions for Substantiating Confidential Business Information (CBI) Claims

The Frank R. Lautenberg Chemical Safety for the 21st Century Act created a number of new requirements for those making confidential business information (CBI) claims in TSCA submissions. Among these requirements is an obligation to substantiate most CBI claims at the time of submission.

Information which may be claimed as CBI without substantiation is identified at TSCA 14(c)(2). This information includes:

- A. Specific information describing the processes used in manufacture or processing of a chemical substance, mixture, or article;
- B. Marketing and sales information;
- C. Information identifying a supplier or customer;
- D. In the case of a mixture, details of the full composition of the mixture and the respective percentages of constituents;
- E. Specific information regarding the use, function, or application of a chemical substance or mixture in a process, mixture, or article;
- F. Specific production or import volumes of the manufacturer or processor; an
- G. Prior to the date on which a chemical substance is first offered for commercial distribution, the specific chemical identity of the chemical substance, including the chemical name, molecular formula, Chemical Abstracts Service number, and other information that would identify the specific chemical substance, if the specific chemical identity was claimed as confidential at the time it was submitted in a notice under TSCA 5.

For other submissions where the submitter has claimed information as CBI, the submitter will be required to upload a document substantiating those CBI claims at the time of submission. The substantiation document should provide EPA any information believed to support the validity of the CBI claims. In order to assist submitters in substantiating their CBI claims, EPA has developed substantiation templates that may be used as a starting point in preparing their CBI substantiations. Submitters are encouraged to use these substantiation template documents, but are not required to do so. The templates and other information relating to substantiating CBI claims can be found at https://www.epa.gov/tsca-cbi/what-information-include-cbi-substantiations.

The Agency is required to review and make a determination on the validity of many CBI claims. Failure to substantiate a CBI claim or a substantiation that does not adequately justify the claim may result in a denial of claims and subsequent public release of information. If you have any questions concerning the options or the substantiation process, please contact:

- · Scott Sherlock, 202-564-8257, sherlock.scott@epa.gov
- Jessica Barkas, 202-250-8880, barkas.jessica@epa.gov

If you believe all of the information you have claimed as CBI is exempt from substantiation under TSCA section 14(c)(2) or has been previously substantiated, select the following "Substantiation Opt Out" checkbox and provide a detailed explanation why you believe substantiation is not required.

| ☐ Substantiation Opt-Out | | | | |
|--|--|--|--|--|
| • Attach Document for CBI Substantiation | | | | |
| Cancel | | | | |



TSCA CBI Certification Step 2

Validation

TSCA CBI Certification

I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate.

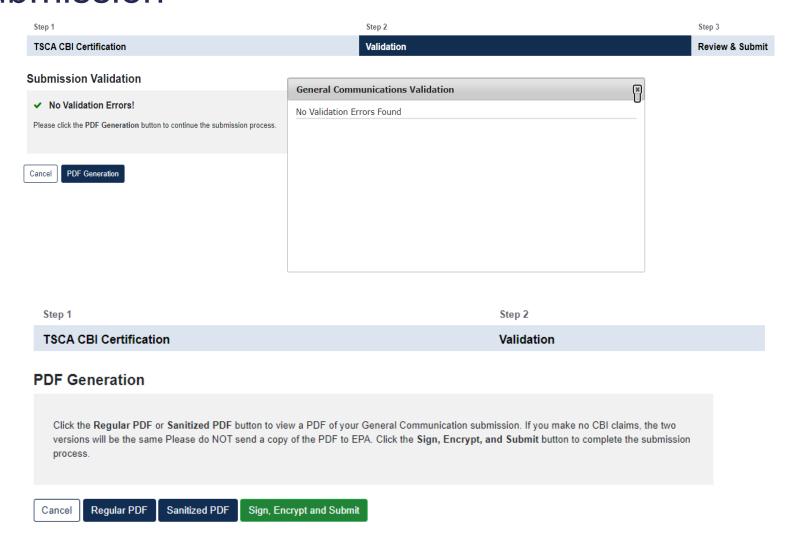
I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for protection for any confidential information made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that the person submitting the claim has:

- 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.

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