

CBI SUBMISSION NOC2021P1 Form Approved. O.M.B. No. 2070-0012. Approval Expires 12/31/2022										
U.S. Environmental Protect NOTICE OF COMMENCE MANUFACTURE OR IMP					EMENT OF		Report Number			
Part I - SUBMITTER IDENTIFICATION				Document Control #:						
Manu	Name of Authorized Official			Mailing A			s (number	CBI*		
Manu- facturer/	(first) Jilliane (last) Conley			684 Wylie Dr				05.		
Importer (in U.S.)		Company Name			City		State	Zip		
	jewelstesting	jewelstesting			Baton Rouge			70808		
Technical	Hamo			Telephone Number						
Contact (in U.S.)	(first) Jilliane	(last) Conley	30	3374841699					X	
Part II - I	Premanufacti			1099						
Part II - Premanufacture Notice (PMN) "P" Case Number:  P-21-7777  Part III - Check the appropriate box and provide the exact date of manufacture or importation:										
X	First Commercial Manufacture**					First Commercial Importation***				
	03/01/2021 E			<del>)</del> :	- I	,				
**Date of commencement is the date of completion of non-exempt manufacture of the first amount (bath, drum, etc.)										
***For importees, the date of commencement is the date that the new chemical substance clears U.S. customs.  Part IV - Manufacturing Plant Site(s) or Importing Site(s): (Importers, provide street address of destination)										
CGI 221 JEFFERSON ST LAFAYETTE, LA 70501										
Part V - Specific Chemical Identity: (For Consolidated submissions, each substance must have a separate NOC form with the specific identity of each chemical substance.)										
Chemical Name: Phenol, 4-(methylamino)-, sulfate (2:1) CASRN: 55-55-0									Х	
Part VI - Generic Chemical Name (if chemical identity is claimed CBI*):										
test										





## Part VII - Substance Identity Confidentiality Status:

Χ

I wish to continue to claim the substance identity confidential and the substantiation to support this claim is attached. Failure to submit the required substantiation in accordance with 40 CFR 720.85(b) will result in a waiver of your claim.

I previously claimed the substance identity as confidential and hereby relinquish that claim.

I did not claim the substance identity as confidential in my original PMN submission.

The public reporting and recordkeeping burden for this collection of information is estimated to average 0.8 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, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed EPA Form 7710-56 to this address.

You must submit your completed notice no later than 30 calendar days after the first date of commercial manufacture/importation to the address shown below:

> U.S. Environmental Protection Agency OPPT Document Control Office (7407M) 1200 Pennsylvania Ave., NW Washington, D.C. 20460 ATTN: Notice of Commencement

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:

- taken reasonable measures to protect the confidentiality of the information;
- determined that the information is not required to be disclosed or otherwise made available to the public under any other (ii) Federal law:
- a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of the person; and
- a reasonable basis to believe that the information is not readily discoverable through reverse engineering.

Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.

Signature of authorized official ES/Jilliane (Conley Date 08/05/2021 Note: CBI\* - refers to the term "Confidential Business Information". Mark (X) in the box if the information is to be held Confidential

EPA Form 7710-25 (12-19)



## Substantiation questions applicable to All CBI claims

(i) Will disclosure of the information claimed as confidential likely cause substantial harm to your business's competitive position? If you answered yes, describe the substantial harmful effects that would likely result to your competitive position if the information is disclosed, including but not limited to how a competitor could use such information, and the causal relationship between the disclosure and the harmful effects.

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(ii) Has your business taken precautions to protect the confidentiality of the disclosed information? If yes, please explain and identify the specific measures, including but not limited to internal controls, that your business has taken to protect the information claimed as confidential. If the same or similar information was previously reported to EPA as non-confidential (such as in an earlier version of this submission), please explain the circumstances of that prior submission and reasons for believing the information is nonetheless still confidential.

Test

(iii)(A) Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.

Test

(B) Does any of the information claimed as confidential otherwise appear in any public documents, including (but not limited to) safety data sheets; advertising or promotional material; professional or trade publications; state, local, or Federal agency files; or any other media or publications available to the general public? If yes, please explain why the information should be treated as confidential.

Test

(C) Does any of the information claimed as confidential appear in one or more patents or patent applications? If yes, provide the associated patent number or patent application number (or numbers) and explain why the information should be treated as confidential.

Test

(iv) Is the claim of confidentiality intended to last less than 10 years (see TSCA section 14(e)(1)(B))? If yes, please indicate the number of years (between 1-10 years) or the specific date after which the claim is withdrawn.

Test

(v) Has EPA, another federal agency, or court made any confidentiality determination regarding information associated with this chemical substance? If yes, please provide the circumstances associated with the prior determination, whether the information was found to be entitled to confidential treatment, the entity that made the decision, and the date of the determination.

Test



## Substantiation questions applicable to Chemical Identification CBI claims

(i) Is this chemical substance publicly known (including by your competitors) to be in U.S. commerce? If yes, please explain why the specific chemical identity should still be afforded confidential status (e.g., the chemical substance is publicly known only as being distributed in commerce for research and development purposes, but no other information about the current commercial distribution of the chemical substance in the United States is publicly available). If no, please complete the certification statement:

I certify that on the date referenced I searched the internet for the chemical substance identity (i.e., by both chemical substance name and CASRN). I did not find a reference to this chemical substance that would indicate that the chemical is being manufactured or imported by anyone for a commercial purpose in the United States. [provide date].

Test

(ii) Does this specific chemical substance leave the site of manufacture (including import) in any form, e.g., as a product, effluent, emission? If yes, please explain what measures have been taken to guard against the discovery of its identity.

Test

(iii) If the chemical substance leaves the site in a form that is available to the public or your competitors, can the chemical identity be readily discovered by analysis of the substance (e.g., product, effluent, emission), in light of existing technologies and any costs, difficulties, or limitations associated with such technologies? Please explain why or why not.

Test

(iv) Would disclosure of the specific chemical identity release confidential process information? If yes, please explain.

Test



(B) Does any of the information claimed as confidential otherwise appear in any public documents, including (but not limited to) safety data sheets; advertising or promotional material; professional or trade publications; state, local, or Federal agency files; or any other media or publications available to the general public? If yes, please explain why the information should be treated as confidential.

Test

- (C) Does any of the information claimed as confidential appear in one or more patents or patent applications? If yes, provide the associated patent number or patent application number (or numbers) and explain why the information should be treated as confidential.
- (iv) Is the claim of confidentiality intended to last less than 10 years (see TSCA section 14(e)(1)(B))? If yes, please indicate the number of years (between 1-10 years) or the specific date after which the claim is withdrawn.

Test

(v) Has EPA, another federal agency, or court made any confidentiality determination regarding information associated with this chemical substance? If yes, please provide the circumstances associated with the prior determination, whether the information was found to be entitled to confidential treatment, the entity that made the decision, and the date of the determination.

Test