



**United States Environmental Protection Agency
Washington, DC 20460**

Section 8(e) Notice

This is an original submission:

This is an amendment:

TSCA 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.

Cross-Media Electronic Reporting Regulation (CROMERR) Certification

I certify, under penalty of law, that this document and all attachments were prepared under my direction of supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature:

ES/William K Brigman

Official Title:

consultant

Contact Person:

William K Brigman

Email Address:

william.brigman@cgifederal.com

Date Signed:

Part 1

Contact Information

Submission Information

Case Number:

Date Submitted:

Submission Alias:

Mon Dec 19 09:50:42 EST 2022

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. 2070-0046). Responses to this collection of information are mandatory for certain persons, as specified at 15 USC 2607(e). 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 50 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.

Submitter Information	CBI:		
	YES: <input checked="" type="checkbox"/> NO: <input type="checkbox"/>		
	Company Name:	Address:	
	CDX Test Org	123 Main St Virginia Beach, VA, 23462 US	
Contact Person:	Contact Person:		
William K Brigman	William K Brigman		
Phone Number:	Email Address:		
8289191634	william.brigman@cgifederal.com		
Technical Contact	CBI:		
	YES: <input checked="" type="checkbox"/> NO: <input type="checkbox"/>		
	Company Name:	Address:	
	CDX Test Org	123 Main St Virginia Beach, VA, 23462 US	
Contact Person:	Contact Person:		
Mr William K Brigman	Mr William K Brigman		
Phone Number:	Email Address:		
8289191634	william.brigman@cgifederal.com		
PART 2	Chemical Reports		
Chemical Identification	Chemical Report Folder Alias:		
	test		
	Chemical Identifying #:	CBI:	
	YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/>		
Chemical Name			
Attached Document(s)	Report Study Title:		
	test		
	Submission Type:	Original Document:	Sanitized Document:
Initial Submission	Attachment for Testing_1.docx	TEST ATTACHMENT-3.docx	
Effects:	Endpoints:		
Environmental Fate	Bioaccumulation: aquatic/sediment		

PART 3	CBI Substantiation
Substantiation Questions	Below are a list of Substantiation questions and the responses filled out in the CBI Substantiation page.
	Data Identifier: Technical Contact Information Chemical Identifier: N/A
	<p>1. Please specifically explain what harm to the competitive position of your business would be likely to result from the release of the information claimed as confidential. How would that harm be substantial? Why is the substantial harm to your competitive position likely (i.e., probable) to be caused by release of the information rather than just possible? If you claimed multiple types of information to be confidential (e.g. site information, exposure information, environmental release information, etc.), explain how disclosure of each type of information would be likely to cause substantial harm to the competitive position of your business.</p> <p>CBI: No</p> <p>Response: Yes</p> <p>Response Text: test</p>
	<p>2. 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.</p> <p>CBI: No</p> <p>Response: Yes</p> <p>Response Text: test</p>
	<p>3A. Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.</p> <p>CBI: No</p> <p>Response: Yes</p> <p>Response Text: test</p>
	<p>3B. Does any of the information claimed as confidential otherwise appear in any public documents, including (but not limited to) safety data sheets; advertising or promotional material; professional or trade publications; state, local, or Federal agency files; or any other media or publications available to the general public? If yes, please explain why the information should be treated as confidential.</p> <p>CBI: No</p> <p>Response: Yes</p> <p>Response Text: test</p>
	<p>3C. Has a patent been published for the chemical identity you claim confidential? What chemical identity information is not revealed by the patent? How is release of that specific information likely to cause substantial competitive harm? And failure to explain this harm may lead to denial of your confidentiality claim.</p> <p>CBI: No</p> <p>Response: Yes</p> <p>Response Text: test</p>

4. 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.

CBI: No

Response: Yes

Response Text: test

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

CBI: No

Response: Yes

Response Text: test

Data Identifier: Submission Type (Document Attachment)
Chemical Identifier: N/A

1. Please specifically explain what harm to the competitive position of your business would be likely to result from the release of the information claimed as confidential. How would that harm be substantial? Why is the substantial harm to your competitive position likely (i.e., probable) to be caused by release of the information rather than just possible? If you claimed multiple types of information to be confidential (e.g. site information, exposure information, environmental release information, etc.), explain how disclosure of each type of information would be likely to cause substantial harm to the competitive position of your business.

CBI: No

Response: Yes

Response Text: test

2. 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.

CBI: No

Response: Yes

Response Text: test

3A. Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.

CBI: No

Response: Yes

Response Text: test

3B. 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.

CBI: No

Response: Yes

Response Text: test

3C. Has a patent been published for the chemical identity you claim confidential? What chemical identity information is not revealed by the patent? How is release of that specific information likely to cause substantial competitive harm? And failure to explain this harm may lead to denial of your confidentiality claim.

CBI: No

Response: Yes

Response Text: test

4. 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.

CBI: No

Response: Yes

Response Text: test

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

CBI: Yes

Response: Yes

Response Text: test

Data Identifier: Submitting Official Information

Chemical Identifier: N/A

1. Please specifically explain what harm to the competitive position of your business would be likely to result from the release of the information claimed as confidential. How would that harm be substantial? Why is the substantial harm to your competitive position likely (i.e., probable) to be caused by release of the information rather than just possible? If you claimed multiple types of information to be confidential (e.g. site information, exposure information, environmental release information, etc.), explain how disclosure of each type of information would be likely to cause substantial harm to the competitive position of your business.

CBI: Yes

Response: Yes

Response Text: test

2. 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.

CBI: Yes

Response: Yes

Response Text: test

3A. Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.

CBI: No

Response: Yes

Response Text: test

3B. 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.

CBI: No

Response: Yes

Response Text: test

3C. Has a patent been published for the chemical identity you claim confidential? What chemical identity information is not revealed by the patent? How is release of that specific information likely to cause substantial competitive harm? And failure to explain this harm may lead to denial of your confidentiality claim.

CBI: No

Response: Yes

Response Text: test

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CBI: No

Response: Yes

Response Text: test

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

CBI: Yes

Response: Yes

Response Text: test

Not for Submission

Paperwork Reduction Act

The information collection requirements contained in the information collection request (ICR) have been submitted for OMB approval under 15 U.S.C. 2607(e). The ICR prepared by EPA, identified under EPA ICR No. 0794.13 and OMB control number 2070-0046, is available in the docket for the ICR. ICR No. 0794.13 addresses the incremental changes to the currently approved ICR documents that cover the existing reporting and record keeping programs that are approved under OMB control number 2070-0046. 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.

Authority

The Government Paperwork Elimination Act (GPEA) (44 U.S.C. 3504) provides that, when practicable, Federal organizations use electronic forms, electronic filings, and electronic signatures to conduct official business with the public. EPA's Cross-Media Electronic Reporting Regulation (CROMERR) (40 CFR part 3) (Ref. 2), provides that any requirement in title 40 of the CFR to submit a report directly to EPA can be satisfied with an electronic submission that meets certain conditions once the Agency published a document in the Federal Register announcing that EPA is prepared to receive certain documents in electronic form. For more information about CROMERR, go to <http://www.epa.gov/cromerr/>.

Not for Submission