



PMN2023P1

OMB No. 2070-00 38 Expires 12/31/2025

<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b>		<b>AGENCY USE ONLY</b>	
 <b>EPA</b>	<b>PREMANUFACTURE NOTICE</b>		Date of receipt: 01/05/2023
	<b>FOR NEW CHEMICAL SUBSTANCES</b>		
When completed, send this form to:	If sending by Courier: Office of Pollution Prevention and Toxics Document Control Office (7407M) US EPA, 1201 Constitution Ave NW WASHINGTON, D.C. 20460 Contact Numbers: 202-564-8930/8940	If sending by US Mail: Office of Pollution Prevention and Toxics Document Control Office (7407M) US EPA, 1200 Pennsylvania Ave NW WASHINGTON, D.C. 20460	<b>Submission Report Number</b>
<b>Total Number of Pages</b>		<b>TS Number</b>	
52		123456	
<b>GENERAL INSTRUCTIONS</b>			
<ul style="list-style-type: none"> <li>You must provide all information requested in this form to the extent that it is known to or reasonably ascertainable by you. Make reasonable estimates if you do not have actual data.</li> <li>Before you complete this form, you should read the "Instructions Manual for Premanufacture Notification" (the Instructions Manual is available from the Toxic Substances Control Act (TSCA) Information Service by calling 202-554-1404, or faxing 202-554-5603).</li> <li>If a fee has been remitted for this notice (40 CFR 700.45), indicate in the boxes above the TS fee identification number you have generated. Remember, your fee ID number must also appear on your corresponding fee remittance. For mailing address information see the Help instructions in the e-PMN tool.</li> </ul>			
<b>Part I – GENERAL INFORMATION</b>		<b>TEST DATA AND OTHER DATA</b>	
<p>You must provide the currently correct Chemical Abstracts (CA) Name of the new chemical substance, even if you claim the identity as confidential. You may authorize another person to submit chemical identity information for you, but your submission will not be complete and the review will not begin until EPA receives this information. A letter in support of your submission should reference your TS fee identification number. For all Section 5 Notice submissions (paper or electronic) you must submit an original notice including all test data; if you claimed any information as confidential, an original sanitized copy must also be submitted.</p>		<p>You are required to submit all test data in your possession or control and to provide a description of all other data known to or reasonably ascertainable by you, if these data are related to the health and environmental effects on the manufacture, processing, distribution in commerce, use, or disposal of the new chemical substance. Standard literature citations may be submitted for data in the open scientific literature. <u>Complete test data (written in English), not summaries of data, must be submitted if they do not appear in the open literature.</u> You should clearly identify whether test data is on the substance or on an analog. Also, the chemical composition of the tested material should be characterized. Following are examples of test data and other data. Data should be submitted according to the requirements of §720.50 of the Premanufacture Notification Rule (40 CFR Part 720).</p>	
<b>Part II – HUMAN EXPOSURE AND ENVIRONMENTAL RELEASE</b>		<b>Test Data (Check Below any included in this notice)</b>	
<p>If there are several manufacture, processing, or use operations to be described in Part II, sections A and B of this notice, reproduce the sections as needed.</p>		<input checked="" type="checkbox"/> Environmental fate data <input type="checkbox"/> Other Data <input type="checkbox"/> Health effects data <input type="checkbox"/> Risk Assessments <input type="checkbox"/> Environmental effects data <input type="checkbox"/> Structure/activity relationships <input type="checkbox"/> Physical/Chemical Properties (A physical and chemical properties worksheet is located on the last page of this form.) <input type="checkbox"/> Test data not in the possession or control of the submitter	
<b>Part III – LIST OF ATTACHMENTS</b>		<b>TYPE OF NOTICE (Check Only One)</b>	
<p>For paper submissions, attach additional sheets if there is not enough space to answer a question fully. Label each continuation sheet with the corresponding section heading. In Part III, list these attachments, any test data or other data and any optional information included in the notice.</p>		<input checked="" type="checkbox"/> <b>PMN</b> (Premanufacture Notice) <input type="checkbox"/> <b>SNUN</b> (Significant New Use Notice) <input type="checkbox"/> <b>TMEA</b> (Test Marketing Exemption Application) <input type="checkbox"/> <b>LVE</b> (Low Volume Exemption) @ 40 CFR 723.50(c)(1) <input type="checkbox"/> <b>LOREX</b> (Low Release/Low Exposure Exemption) @ 40 CFR 723.50(c)(2) <input type="checkbox"/> <b>LVE Modification</b> <input type="checkbox"/> <b>LOREX Modification</b> <input type="checkbox"/> <b>Mock Submission</b>	
<b>OPTIONAL INFORMATION</b>		<input checked="" type="checkbox"/> Mark (X) if pending Letter of Support <input type="checkbox"/> <b>IS THIS A CONSOLIDATED PMN (Y/N)?</b> N # of chemicals or polymers (Prenotice Communication # required, enter # on p. 3). 1 <input checked="" type="checkbox"/> Mark (X) if any information in this notice is claimed as confidential.	
<b>CONFIDENTIALITY CLAIMS</b>			
<p>You may claim any information in this notice as confidential. To assert a claim on the form, mark (X) the confidential box next to the information that you claim as confidential. To assert a claim in an attachment, circle or bracket the information you claim as confidential. <u>If you claim information in the notices as confidential, you must also provide a sanitized version of the notice, (including attachments).</u> For additional instructions on claiming information as confidential, read the Instructions Manual.</p>			

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. 2070-0038). Responses to this collection of information are mandatory for certain persons, as specified at 40 CFR 721 and 725. 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 between 16.97 to 525.85 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.



The public reporting and recordkeeping burden for this collection of information is estimated to average 93 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 7710-25 to this address.

**CERTIFICATION --** A printed copy of this signature page, with original signature, must be submitted with CD or paper submission.

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.

**Additional Certification Statements:**

If you are submitting a PMN, SNUN, LoREX, LVE, or TMEA, check the following Fees Certification statement that applies:

- The Company named in Part I, Section A is a "small business concern" as defined under 40 CFR 700.43 and will remit the fee as specified in 40 CFR 700.45(c).
- The Company named in Part I, Section A will remit the fee as specified in 40 CFR 700.45(c).
- This joint submission includes at least one Company which is a "small business concern" and at least one Company which is not a "small business concern," as defined under 40 CFR 700.43. The fee will be remitted with the joint submission. Any remaining balance due for this joint submission is to be paid by the secondary submitter(s).
- The company named in Part I, Section A is submitting a sustainable futures TME. The company has graduated from EPA's Sustainable Futures program and is therefore exempt from fees for this sustainable futures TME.

If you are submitting a **Low Volume Exemption (LVE)** application in accordance with 40 CFR 723.50(c)(1) or a **Low Release and Low Exposure Exemption (LoRex)** application in accordance with 40 CFR 723.50(c)(2), check the following certification statements:

- The manufacturer submitting this notice intends to manufacture or import the new chemical substance for commercial purposes, other than in small quantities solely for research and development, under the terms of 40 CFR 723.50.
- The manufacturer is familiar with the terms of this section and will comply with those terms; and
- The new chemical substance for which the notice is submitted meets all applicable exemption conditions.
- If this application is for an LVE in accordance with 40 CFR 723.50(c)(1), the manufacturer intends to commence manufacture of the exempted substance for commercial purposes within 1 year of the date of the expiration of the 30 day review period.

Confidential

Signature and title of Authorized Official (Original Signature Required)	<i>ES/Scott Stevenson</i>	Date	01/05/2023	<input checked="" type="checkbox"/>
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## PMN Page 3

CBI SUBMISSION

## Part I -- GENERAL INFORMATION

Section A – SUBMITTER IDENTIFICATION								
Mark (X) the "Confidential" box next to any subsection you claim as confidential								
<b>1a.</b>	<b>Person Submitting Notice (in U.S.)</b>						Confidential	
Name of Authorized Official	(first) Scott		(last) Stevenson				<input checked="" type="checkbox"/>	
Position	Not Applicable							
Company	CGI FEDERAL							
Mailing Address (number & street)	12601 FAIRLAKES CIRCLE							
City	FAIRFAX	State	VA	Postal Code	22033			
email	s.stevenson@cgifederal.com							
<b>b.</b>	<b>Agent (if Applicable)</b>						Confidential	
Name of Authorized Official	(first) Scott		(last) Stevenson				<input checked="" type="checkbox"/>	
Position								
Company	CGI FEDERAL							
Mailing Address (number & street)	12601 FAIRLAKES CIRCLE							
City	FAIRFAX	State	VA	Postal Code	22033			
e-mail	s.stevenson@cgifederal.com			Telephone (include area code)	5713180113			
<b>c.</b>	<b>Joint Submitter (if applicable)</b>						Confidential	
If you are submitting this notice as part of a joint submission, mark (X)						<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Name of Authorized Official	(first) John		(last) Doe					
Position								
Company	Test							
Mailing Address (number & street)	123 fakestreet							
City	Test	State	VA	Postal Code	12345			
e-mail	S.STEVENSON@CGIFEDERAL.COM			Telephone (include area code)	1234567890			
<b>2.</b>	<b>Technical Contact (in U.S.)</b>						Confidential	
Name of Authorized Official	(first) Scott		(last) Stevenson				<input checked="" type="checkbox"/>	
Position								
Company	CGI FEDERAL							
Mailing Address (number & street)	12601 FAIRLAKES CIRCLE							
City	FAIRFAX	State	VA	Postal Code	22033			
e-mail	s.stevenson@cgifederal.com			Telephone (include area code)	5713180113			
<b>3.</b>	If you have had a prenotice communication (PC) concerning this notice and EPA assigned a PC Number to the notice, enter the number.	1		Mark (X) if none		Confidential		
				<input type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>4.</b>	If you previously submitted an exemption application for the chemical substance covered by this notice, enter the exemption number assigned by EPA. If you previously submitted a PMN for this substance enter the PMN number assigned by EPA (i.e. withdrawn or incomplete).	P-22-2222		Mark (X) if none		Confidential		
				<input type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>5.</b>	If you have submitted a notice of Bona fide intent to manufacture or import for the chemical substance covered by this notice, enter the notice number assigned by EPA.	3		Mark (X) if none		Confidential		
				<input type="checkbox"/>		<input checked="" type="checkbox"/>		
<b>6.</b>	<b>Type of Notice – Mark (X)</b>							
1.	Manufacture Only	<input checked="" type="checkbox"/>	2.	Import Only	<input type="checkbox"/>	3.	Both	<input type="checkbox"/>
	Binding Option	<input type="checkbox"/>		Binding Option	<input type="checkbox"/>			



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# Continuation Sheet

<b>ID</b>	P3SB1bC1	<b>Field</b>	Part I, Section A, 1.c. Letter Of Support
<p>First Name: Jane Last Name: Doe Position: Company Name: Test Address: 123 fakestreet City: Test State: VA Postal Code: 12345 Country: US Email: s.stevenson@cgifederal.com Telephone: 1234567890 CBI: Y</p>			



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## PMN Page 4

CBI SUBMISSION

## Part I – GENERAL INFORMATION -- Continued

<b>Section B – CHEMICAL IDENTITY INFORMATION:</b>		You must provide a currently correct Chemical Abstracts (CA) name of the substance based on current CA index nomenclature rules and conventions.		
Mark (X) the "Confidential" box next to any item you claim as confidential				
Complete either item 1 (Class 1 or 2 substances) or 2 (Polymers) as appropriate. Complete all other items.				
If another person will submit chemical identity information for you (for either Item 1 or 2), mark (X) the box at the right. Identify the name, company, and address of that person in a continuation sheet.				<input type="checkbox"/>
1. Class 1 or 2 chemical substances (for definitions of class 1 and class 2 substances, see the Instructions Manual)		Class 1	Class 2	CBI
a. Class of substance - Mark (X)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Chemical name (Currently correct Chemical Abstracts (CA) Name that is consistent with TSCA Inventory listings for similar substances. For Class 1 substances a CA Index Name must be provided. For Class 2 substances either a CA Index Name or CA Preferred Name must be provided, which ever is appropriate based on current CA index nomenclature rules and conventions).				<input checked="" type="checkbox"/>
Formaldehyde				
CAS Registry Number (if a number already exists for the substance)		50-00-0		
c. Please identify which method you used to develop or obtain the specified chemical identity information reported in this notice: (check one).				
<b>Method 1</b> (CAS Inventory Expert Service - a copy of the Identification report obtained from the CAS Inventory Expert Services must be submitted as an attachment to this notice)		IES Order Number	<b>Method 2</b> (Other Source)	
<input type="checkbox"/>			<input checked="" type="checkbox"/>	
Enter Attachment filename for Part I, Section B, 1. c.				<input type="checkbox"/>
d. Molecular formula	test			<input checked="" type="checkbox"/>
e. For a class 1 substance, provide a complete and correct chemical structure diagram. For a class 2 substance, provide a correct representative or partial chemical structure diagram, as complete as can be known, if one can be reasonably ascertained.				<input checked="" type="checkbox"/>
See Attachment (Original Document: 1 CBI.docx )				
Enter Attachment filename for Part I, Section B, 1. e.				<input type="checkbox"/>



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### PMN Page 4a

CBI SUBMISSION

For a class 2 substance - (1) List the immediate precursor substances with their respective CAS Registry Numbers. (2) Describe the nature of the reaction or process. (3) Indicate the range of composition and the typical composition (where appropriate).

Confidential

e. (1) List the immediate precursor substance names with their respective CAS Registry Numbers.

Enter Attachment filename for Part I, Section B, 1. e. (1)

e. (2) Describe the nature of the reaction or process.

Enter Attachment filename for Part I, Section B, 1. e. (2)

e. (3) Indicate the range of composition and the typical composition (where appropriate).

Enter Attachment filename for Part I, Section B, 1. e. (3)



Part I -- GENERAL INFORMATION -- Continued

Section B -- CHEMICAL IDENTITY INFORMATION -- Continued

3. Impurities

- (a) - Identify each impurity that may be reasonably anticipated to be present in the chemical substance as manufactured for commercial purpose. Provide the CAS Registry Number if available. If there are unidentified impurities, enter "unidentified."
- (b) - Estimate the maximum weight % of each impurity. If there are unidentified impurities, estimate their total weight %.

Impurity (a)	CAS Registry Number (a)	Maximum Percent % (b)	Confidential
Formaldehyde	50-00-0	5.0	X

Mark (X) this box if the data continues on the next page.

Enter Attachment filename for Part I, Section B, 3.

4. Synonyms - Enter any chemical synonyms for the new chemical identified in subsection 1 or 2.

Enter Attachment filename for Part I, Section B, 4.

5. Trade identification - List trade names for the new chemical substance identified in subsection 1 or 2.

Enter Attachment filename for Part I, Section B, 5.

6. Generic chemical name - If you claim chemical identify as confidential, you must provide a generic name for your substance that reveals the specific chemical identity of the new chemical substance to the maximum extent possible. Refer to the TSCA Chemical Substance Inventory, 1985 Edition, Appendix B for guidance on developing generic names.

test chem,

Enter Attachment filename for Part I, Section B, 6.

7. Byproducts - Describe any byproducts resulting from the manufacture, processing, use, or disposal of the new chemical substance. Provide the CAS Registry Number if available.

Byproduct (1)	CAS Registry Number (2)	Confidential

Mark (X) this box if the data continues on the next page.





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Part I -- GENERAL INFORMATION -- Continued

Section B -- CHEMICAL IDENTITY INFORMATION -- Continued

2. Polymers (For a definition of polymer, see the Instructions Manual.) Confidential

a. Indicate the number-average weight of the lowest molecular weight composition of the polymer you intend to manufacture. Indicate maximum weight percent of low molecular weight species (not including residual monomers, reactants, or solvents) below 500 and below 1,000 absolute molecular weight of that composition.

Describe the methods of measurement or the basis for your estimates:

GPC Other (Specify Below)

Specify Other:

Table with 3 columns: (i) lowest number average molecular weight, (ii) maximum weight % below 500 molecular weight, (iii) maximum weight % below 1000 molecular weight.

Enter Attachment filename for Part I, Section B, 2. a.

b. You must make separate confidentiality claims for monomer or other reactant identity, composition information, and residual information. Mark (X) the "Confidential" box next to any item you claim as confidential

- (1) - Provide the specific chemical name and CAS Registry Number (if a number exists) of each monomer or other reactant used in the manufacture of the polymer.
(2) - Mark (X) this column if entry in column (1) is confidential.
(3) - Indicate the typical weight percent of each monomer or other reactant in the polymer.
(4) - Choose "yes" from drop down menu if you want a monomer or other reactant used at two weight percent or less to be listed as part of the polymer description on the TSCA Chemical Substance Inventory.
(5) - Mark (X) this column if entries in columns (3) and (4) are confidential.
(6) - Indicate the maximum weight percent of each monomer or other reactant that may be present as a residual in the polymer as manufactured for commercial purposes.
(7) - Mark (X) this column if entry in column (6) is confidential.

Table with 7 columns: Monomer or other reactant specific chemical name (1), CBI (2), Typical composition (3), Include in identity (4), CBI (5), Max residual (6), CBI (7). Includes rows for CAS Registry Number (1).

Mark (X) this box if the data continues on the next page.



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### PMN Page 5a

CBI SUBMISSION

c. Please identify which method you used to develop or obtain the specified chemical identity information reported in this notice (check one).			<b>CBI</b>
<b>Method 1</b> (CAS Inventory Expert Service - a copy of the identification report obtained from CAS Inventory Expert Service must be submitted as an attachment to this notice) <input type="checkbox"/>	IES Order Number		<b>Method 2</b> (other source) <input type="checkbox"/>
Enter Attachment filename for Part I, Section B, 2. c.			<input type="checkbox"/>
d. The currently correct Chemical Abstracts (CA) name for the polymer that is consistent with TSCA Inventory listings for similar polymers.			<input type="checkbox"/>
CAS Registry Number (if a number already exists for the substance)			
e. Provide a correct representative or partial chemical structure diagram, as complete as can be known, if one can be reasonably ascertained.			<input type="checkbox"/>
Enter Attachment filename for Part I, Section B, 2. e.			<input type="checkbox"/>



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Part I -- GENERAL INFORMATION -- Continued

Section C -- PRODUCTION, IMPORT, AND USE INFORMATION:

The information on this page refers to consolidated chemical number(s): [X] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5 [ ] 6

Mark (X) the "Confidential" box next to any item you claim as confidential.

1. Production volume -- Estimate the maximum production volume during the first 12 months of production. Also estimate the maximum production volume for any consecutive 12-month period during the first three years of production. Estimates should be on 100% new chemical substance basis. For a Low Volume Exemption application, if you choose to have your notice reviewed at a lower production volume than 10,000 kg/yr, specify the volume and mark (x) in the binding box. If granted, you are bound to this volume.

Table with 4 columns: Maximum first 12-month production (kg/yr), Maximum 12-month production (kg/yr), Confidential, Binding Option Mark (X). Row 1: 2, 2, [X], [ ]

Enter Attachment filename for Part I, Section C, 1.

CBI [ ]

2. Use Information -- You must make separate confidentiality claims for the description of the category of use, the percent of production volume devoted to each category, the formulation of the new substance, and other use information. Mark (X) the "Confidential" Box next to any item you claim as confidential.

- a. (1) --Describe each intended category of use of the new chemical substance by function and application. (2) --Mark (X) this column if entry column (1) is confidential business information (CBI). (3) --Indicate your willingness to have the information provided in column (1) binding. (4) --Estimate the percent of total production for the first three years devoted to each category of use. (5) --Mark (X) this column if entry in column (4) is confidential business information (CBI). (6) --Estimate the percent of the new substance as formulated in mixtures, suspensions, emulsions, solutions, or gels as manufactured for commercial purposes at sites under your control associated with each category of use. (7) --Mark (X) this column if entry in column (6) is confidential business information (CBI). (8) --Indicate % of product volume expected for the listed "use" sectors. Mark more than one box if appropriate. Mark (X) to indicate your willingness to have the use type provided in (8) binding. (9) --Mark (X) this column if entry(ies) in column (8) is (are) confidential business information (CBI).

Table with 11 columns: Category of use (1), CBI (2), Binding Option Mark (X) (3), Prod uction % (4), CBI (5), % in Form-ulation (6), CBI (7), % of substance expected per use (8) (Site-limited, Con-sumer\*, Industrial, Com-mercial, Binding Option), CBI (9). Row 1: test, X, [ ], 100.0, X, 100.0, X, 25.0, 25.0, 25.0, 25.0, [ ]

\* If you have identified a "consumer" use, please provide on a continuation sheet a detailed description of the use(s) of this chemical substance in consumer products. In addition include estimates of the concentration of the new chemical substance as expected in consumer products and describe the chemical reactions by which this substance loses its identity in the consumer product.

Mark (X) this box if the data continues on the next page. [X]

b. Generic use description: testing. If you claim any category of use description in subsection 2a as confidential, enter a generic description of that category. Read the Instruction Manual for examples of generic use descriptions.

Enter Attachment filename for Part I, Section C, 2. b.

CBI [ ]

3. Hazard Information -- Include in the notice a copy of reasonable facsimile of any hazard warning statement, label, material safety data sheet, or other information which will be provided to any person who is reasonably likely to be exposed to this substance regarding protective equipment or practices for the safe handling, transport, use, or disposal of the new substance. List in part III hazard information you include. Binding Option Mark (X)

Mark (X) this box if you attach hazard information. [ ] [ ]



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# Continuation Sheet

<b>ID</b>		<b>Field</b>	Part I, Section C, 2.a. Additional Consumer Use Text
<p>Category of Use: test Consumer Use: test : testing Attachments:</p>			



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Part II-- HUMAN EXPOSURE AND ENVIRONMENTAL RELEASE

Section A -- INDUSTRIAL SITES CONTROLLED BY THE SUBMITTER

Mark (X) the "Confidential" box next to any item you claim as confidential

The information on pages 8 and 8a refer to consolidated chemical number(s):  1  2  3  4  5  6

Complete section A for each type of manufacture, processing, or use operation involving the new chemical substance at industrial sites you control. Importers do not have to complete this section for operations outside the U.S.; however, you may still have reporting requirements if there are further industrial processing or use operations after import. You must describe these operations. See instructions manual

1. Operation description  
a.1 Identity -- Enter the identity of the site at which the operation will occur. Confidential

Name	CGI FEDERAL DEMO			<input checked="" type="checkbox"/>
Site address (number and street)	12601 FAIR LAKES CIR			
City	FAIRFAX	County	FAIRFAX COUNTY	
State	VA	ZIP code	22033	

a.2 If the same operation will occur at more than one site, enter the number of sites. Identify the additional sites on a continuation sheet, and if any of the sites have significantly different production rates or operations, include all the information requested in this section for those sites as attachments. → 1

Mark (X) this box if the data continues on the next page.

b. Type -- Manufacturing  Processing  Use  Confidential

c. Amount and Duration -- Complete 1 or 2 as appropriate Confidential

	Maximum kg/batch (100% new chemical substance)	Hours/batch	Batches/year	
1. Batch				<input type="checkbox"/>
2. Continuous	Maximum kg/day (100% new chemical substance)	Hours/day	Days/year	<input type="checkbox"/>

d. Process description Mark (X) to indicate your willingness to have your process description binding.

- (1) Diagram the major unit operation steps and chemical conversions. Include interim storage and transport containers (specify- e.g. 5 gallon pails, 55 gallon drum, rail car, tank truck, etc.).
- (2) Provide the identity, the approximate weight (by kg/day or kg/batch on a 100% new chemical substance basis), and entry point of all starting materials and feedstocks (including reactants, solvents, catalysts, etc.), and of all products, recycle streams, and wastes. Include cleaning chemicals (note frequency if not used daily or per batch.).
- (3) Identify by number the points of release, including small or intermittent releases, to the environment of the new chemical substance. If releasing to two media at the same step, assign a second release number for the second medium.

test



PMN2023P8A

# PMN Page 8a

CBI SUBMISSION

Diagram of the major unit operation steps.

Confidential

Enter Attachment filename for Part II, Section A, 1. d.









Part II-- HUMAN EXPOSURE AND ENVIRONMENTAL RELEASE – Continued

Section B -- INDUSTRIAL SITES CONTROLLED BY OTHERS

The information on pages 10 and 10a refer to consolidated chemical number(s):  1  2  3  4  5  6

Complete section B for typical processing or use operations involving the new chemical substance at sites you do not control. Importers do not have to complete this section for operations outside the U.S.; however, you must report any processing or use activities after import. See the Instructions Manual. Complete a separate section B for each type of processing, or use operation involving the new chemical substance. If the same operation is performed at more than one site describe the typical operation common to these sites. Identify additional sites on a continuation sheet.

1(a). Operation Description -- To claim information in this section as confidential, bracket (e.g. {}) the specific information that you claim as confidential.

- (1) -- Diagram the major unit operation steps and chemical conversions, including interim storage and transport containers (specify - e.g. 5 gallon pails, 55 gallon drums, rail cars, tank trucks, etc). On the diagram, identify by letter and briefly describe each worker activity.
- (2) -- Either in the diagram or in the text field 1(b) below, provide the identity, the approximate weight (by kg/day or kg/batch, on an 100% new chemical substance basis), and entry point of all feedstocks (including reactants, solvents and catalysts, etc) and all products, recycle streams, and wastes. Include cleaning chemicals (note frequency if not used daily or per batch).
- (3) -- Either in the diagram or in the text field 1(b) below, identify by number the points of release, including small or intermittent releases, to the environment of the new chemical substance.
- (4) -- Please enter the # of sites (remember to identify the locations of these sites on a continuation sheet):

	<b>Number of Sites</b>		Confidential <input type="checkbox"/>
--	------------------------	--	---------------------------------------

1(b). (Optional) This space is for a text description to clarify the diagram above. Confidential

Enter Attachment filename for Part II, Section B on the bottom of page 10a.



2. Worker Exposure/Environmental Release

- (1) -- From the diagram above, provide the letter for each worker activity. Complete 2-8 for each worker activity described.
  - (2) -- Estimate the number of workers exposed for all sites combined.
  - (4) -- Estimate the typical duration of exposure per worker in (a) hours per day and (b) days per year.
  - (6) -- Describe physical form of exposure and % new chemical substance (if in mixture), and any protective equipment and engineering controls, if any, used to protect workers.
  - (7) -- Estimate the percent of the new substance as formulated when packaged or used as a final product.
  - (9) -- From the process diagram above, enter the number of each release point. Complete 9-13 for each release point identified.
  - (10) -- Estimate the amount of the new substance released (a) directly to the environment or (b) into control technology to the environment (in kg/day or kg/batch).
  - (12) -- Describe media of release i.e. stack air, fugitive air (optional-see Instructions Manual), surface water, on-site or off-site land or incineration, POTW, or other (specify) and control technology, if any, that will be used to limit the release of the new substance to the environment.
  - (14) -- Identify byproducts which may result from the operation.
- (3), (5), (8), (11), (13) and (15) -- Mark (X) this column if any of the proceeding entries are confidential business information (CBI).

Letter of Activity	# of Workers Exposed	CBI	Duration of Exposure		CBI	Protective Equip./Engineering Controls/Physical Form	% new substance	% in Formulation	CBI
			(4a)	(4b)					
(1)	(2)	(3)	(4a)	(4b)	(5)	(6)	(6)	(7)	(8)

Release Number	Amount of New Substance Released		CBI	Media of Release & Control Technology	CBI
	(10a)	(10b)			
(9)	(10a)	(10b)	(11)	(12)	(13)

Mark (X) this box if the data continues on the next page.

(14) Byproducts:		(15) CBI	<input type="checkbox"/>
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Enter Attachment filename for Part II, Section B.	<input type="checkbox"/>
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**OPTIONAL POLLUTION PREVENTION INFORMATION**

To claim information in the following section as confidential, bracket (e.g. {}) the specific information that you claim as confidential.

In this section you may provide information not reported elsewhere in this form regarding your efforts to reduce or minimize potential risks associated with activities surrounding manufacturing, processing, use and disposal of the PMN substance. Please include new information pertinent to pollution prevention, including source reduction, recycling activities and safer processes or products available due to the new chemical substance. Source reduction includes the reduction in the amount or toxicity of chemical wastes by technological modification, process and procedure modification, product reformulation, and/or raw materials substitution. Recycling refers to the reclamation of useful chemical components from wastes that would otherwise be treated or released as air emissions or water discharges, or land disposal. Quantitative or qualitative descriptions of pollution prevention, source reduction and recycling should emphasize potential risk reduction in addition to compliance with existing regulatory requirements. The EPA is interested in the information to assess overall net reductions in toxicity or environmental releases and exposures, not the shifting of risks to other media (e.g., air to water) or nonenvironmental areas (e.g., occupational or consumer exposure). To the extent known, information about the technology being replaced will assist EPA in its relative risk determination. In addition, information on the relative cost or performance characteristics of the PMN substance to potential alternatives may be provided.

Describe the expected net benefits, such as

- (1) an overall reduction in risk to human health or the environment;
- (2) a reduction in the generation of waste materials through recycling, source reduction or other means;
- (3) a reduction in the use of hazardous starting materials, reagents, or feedstocks;
- (4) a reduction in potential toxicity, human exposure and/or environmental release; or
- (5) the extent to which the new chemical substance may be a substitute for an existing substance that poses a greater overall risk to human health or the environment.

**Information provided in this section will be taken into consideration during the review of this substance. See PMN Instructions Manual and Pollution Prevention Guidance manual for guidance and examples.**

This pollution prevention information contains CBI.  
testing

Enter Attachment filename for Pollution Prevention Page 11.







## PMN Page 13

## PHYSICAL AND CHEMICAL PROPERTIES WORKSHEET

The information on this page refers to chemical number(s):  1  2  3  4  5  6

To assist EPA's review of physical and chemical properties data, please complete the following worksheet for data you provide and include it in the notice. Identify the property measured, the value of the property, the units in which the property is measured (as necessary), and whether or not the property is claimed as confidential. Give the attachment number (found on page 12) in column (b). The physical state of the neat substance should be provided. These measured properties should be for the neat (100% pure) chemical substance. Properties that are measured for mixtures or formulations should be so noted (% PMN substance in \_\_\_). You are not required to submit this worksheet; however, EPA strongly recommends that you do so, as it will simplify the review and ensure that confidential information is properly protected. You should submit this worksheet as a supplement to your submission of test data. This worksheet is not a substitute for submission of test data.

Property (a)	Unit	Mark X if Provided	Attachment Number (b)	Value (c)			Measured or Estimate (M or E)	CBI Mark (X) (d)
				(solid)	(liquid)	(gas)		
Physical state of neat substance		<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Vapor Pressure @ Temperature	°C	<input type="checkbox"/>				Torr		
Density/relative density		<input type="checkbox"/>				g/cm <sup>3</sup>		
Solubility								
@ Temperature	°C	<input type="checkbox"/>				g/L		
Solvent								
Solubility in Water @ Temperature	°C	<input type="checkbox"/>				g/L		
Melting Temperature		<input type="checkbox"/>				°C		
Boiling / Sublimation temperature @	7	Torr	<input checked="" type="checkbox"/>	1		°C	Estimate	X
Spectra		<input type="checkbox"/>						
Dissociation constant		<input type="checkbox"/>						
Octanol / water partition coefficient		<input type="checkbox"/>						
Henry's Law constant		<input type="checkbox"/>						
Volatilization from water		<input type="checkbox"/>						
Volatilization from soil		<input type="checkbox"/>						
pH@ concentration		<input type="checkbox"/>						
Flammability		<input type="checkbox"/>						
Explosibility		<input type="checkbox"/>						
Adsorption / Coefficient		<input type="checkbox"/>						
Particle Size Distribution		<input type="checkbox"/>						
Other – Specify		<input type="checkbox"/>						



## CBI Substantiation

**Selected Chemical Identifier:** N/A

**Selected Chemical Claim: Additional Submission Information - Bona Fide Intent Notice Number--3**

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.

Yes/No: Yes

Cbi: Yes

test 5

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.

Yes/No: No

Cbi: No

test

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

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

test

**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: Additional Submission Information - Prenotice Communication Number--1**

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.

Yes/No: Yes

Cbi: No

test 3

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.

Yes/No: No

Cbi: No

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

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: Additional Submission Information - Previously Submitted Notice Number--P-22-2222**

**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.

Yes/No: Yes

Cbi: Yes

test 4

**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.

Yes/No: No

Cbi: No

test

**3A.** Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law?

If yes, please explain.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

test

**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: Agent Contact Information--Stevenson, Scott**

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.

Yes/No: Yes

Cbi: Yes

test 1

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.

Yes/No: No

Cbi: No

test

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

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

test

**Selected Chemical Identifier: 50-00-0**

**Selected Chemical Claim: CLASS 1 OR 2 CHEMICAL SUBSTANCES - Chemical Name--Formaldehyde**

1. 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 and have no knowledge of public information that would indicate that the chemical is being manufactured or imported by anyone for a commercial purpose in the United States. [provide date].

Yes/No: Yes

Cbi: Yes

test 6

2. 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.

Yes/No: No

Cbi: No

test

3. 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.

Yes/No: No

Cbi: No

test

**4.** Would disclosure of the specific chemical identity release confidential process information? If yes, please explain.

Yes/No: No

Cbi: No

test

**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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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**3A.** Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law?

If yes, please explain.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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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.

Yes/No: No

Cbi: No

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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.

Yes/No: No

Cbi: No

test

**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: CLASS 1 OR 2 CHEMICAL SUBSTANCES - Document--CBI.docx (Chemical Structure)**

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.

Yes/No: Yes

Cbi: No

test 8

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.

Yes/No: No

Cbi: No

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

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: CLASS 1 OR 2 CHEMICAL SUBSTANCES - Molecular Formula--null**

**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.

Yes/No: Yes

Cbi: No

test 7

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

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

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**Selected Chemical Identifier: 50-00-0**

**Selected Chemical Claim: ADDITIONAL CHEMICAL INFORMATION - Impurity--Formaldehyde**

1. 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 and have no knowledge of public information that would indicate that the chemical is being manufactured or imported by anyone for a commercial purpose in the United States. [provide date].

Yes/No: Yes

Cbi: No

test 9

2. 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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

3. 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.

Yes/No: No

Cbi: No

test

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

Yes/No: No

Cbi: No

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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.

Yes/No: No



Cbi: No  
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.

Yes/No: No  
Cbi: No  
test

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

Yes/No: No  
Cbi: No  
\*Text Area Left Empty\*

**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.

Yes/No: No  
Cbi: No  
\*Text Area Left Empty\*

**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.

Yes/No: No  
Cbi: No  
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**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.

Yes/No: No  
Cbi: No  
\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: PHYSICAL AND CHEMICAL PROPERTIES WORKSHEET - Property**

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.

Yes/No: Yes

Cbi: Yes

test 14

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.

Yes/No: No

Cbi: No

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

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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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.

Yes/No: No

Cbi: No

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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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: PRODUCTION VOLUME AND HAZARD/SAFETY INFORMATION - Production Volume**

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.

Yes/No: Yes

Cbi: No

test 10

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.

Yes/No: No

Cbi: No

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

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: USE INFORMATION - Category of Use (PMN)**

**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.

Yes/No: Yes

Cbi: No

test 11

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

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

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: USE INFORMATION - In Formulation (PMN)**

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.

Yes/No: Yes

Cbi: No

test 13

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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

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

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

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.

Yes/No: No

Cbi: No

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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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: USE INFORMATION - Total Production Percent (PMN)**

**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.

Yes/No: Yes

Cbi: No

test 12

**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.

Yes/No: No

Cbi: No

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

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: ENVIRONMENTAL RELEASES - POTW**

**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.

Yes/No: Yes

Cbi: Yes

test 16

**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.

Yes/No: No

Cbi: No

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**3A.** Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law?

If yes, please explain.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: JOINT SUBMITTER INFORMATION - Contact--Doe,John**

**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.

Yes/No: Yes

Cbi: No

test 18

**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.

Yes/No: No

Cbi: No

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**3A.** Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law?

If yes, please explain.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: LETTER OF SUPPORT SUBMITTER INFORMATION - Contact--Doe,Jane**

**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.

Yes/No: Yes

Cbi: Yes

test 19

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

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

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: OCCUPATIONAL EXPOSURES - Worker Category**

**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.

Yes/No: Yes

Cbi: No

test 15

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**3A.** Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law?

If yes, please explain.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: OPTIONAL COVER LETTER - Optional Cover Letter (PMN)**

**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.

Yes/No: Yes

Cbi: No

test 18

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**3A.** Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law?

If yes, please explain.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: OPTIONAL POLLUTION PREVENTION-Information-Comments**

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.

Yes/No: Yes

Cbi: Yes

test 17

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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

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

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

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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.

Yes/No: No

Cbi: No

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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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: SUBMITTER OPERATION INFORMATION - Facility--CGI FEDERAL DEMO**

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.

Yes/No: Yes

Cbi: Yes

test 15

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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

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

Yes/No: No



Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

\*Text Area Left Empty\*

**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: SUBMITTING OFFICIAL INFORMATION - Submitter**

**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.

Yes/No: Yes

Cbi: Yes

test 20

**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.

Yes/No: No

Cbi: No

test

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

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

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.

Yes/No: No

Cbi: No

test

**Selected Chemical Identifier: N/A**

**Selected Chemical Claim: Technical Contact Information--Stevenson, Scott**

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.

Yes/No: Yes

Cbi: No

test 2

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.

Yes/No: No

Cbi: No

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**3A.** Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law?

If yes, please explain.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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**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.

Yes/No: No

Cbi: No

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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.

Yes/No: No

Cbi: No

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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.

Yes/No: No

Cbi: No

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