

## TSCA Section 12(b) Export Notification

**Submission Alias: 12b-65-8892**

### Submitter Information

**CBI**

First Name	<b>James</b>		
Last Name	<b>Goldsmith</b>		
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Job Title	<b>Consultant</b>		
Organization Name	<b>CGI FEDERAL</b>		
Address Line 1	<b>12601 FAIRLAKES CIRCLE</b>		
Address Line 2			
City	State	Postal Code	Country
<b>FAIRFAX</b>	<b>Virginia</b>	<b>22033</b>	<b>United States</b>

### Exporter Information

Company Name	<b>CGI FEDERAL</b>		<b>CBI</b>	<input checked="" type="checkbox"/>
Address Line 1	<b>12601 FAIRLAKES CIRCLE</b>		<b>CBI</b>	<input checked="" type="checkbox"/>
Address Line 2				
City	State	Postal Code		
<b>FAIRFAX</b>	<b>Virginia</b>	<b>22033</b>	<b>United States</b>	

### Exported Chemicals

#### Export - 1

Chemical Name	<b>Naphthalene, 1,2,3,4-tetrahydro(1-phenylethyl)-</b>
CASRN	<b>63674-30-6</b>
TSCA Section	<b>Section 5</b>

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<b>Category</b>	<b>Perfluoroalkyl Sulfonates (PFAS)</b>		
<b>Import Country</b>	<b>Australia</b>	<b>CBI</b>	<input checked="" type="checkbox"/>
<b>Export Date</b>	<b>01/12/2023</b>	<b>CBI</b>	<input checked="" type="checkbox"/>

**CBI Substantiation**

<b>Regular File</b>		<b>CBI</b>	<input type="checkbox"/>
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**General Claim: *Submitter Information***

**Applicable Only to General CBI Claims**

A person may assert a claim of confidentiality for the specific chemical identity of a chemical substance as described in § 711.15(b)(3) of this part only if the identity of that chemical substance is treated as confidential in the Master Inventory File as of the time the report is submitted for that chemical substance. Generic chemical identities and accession numbers may not be claimed as confidential. To assert a claim of confidentiality for the identity of a reportable chemical substance, you must submit with the report detailed written answers to the questions from subsection (b) and to the following questions.

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G1) 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.</b>	<b>X</b>		<input checked="" type="checkbox"/>

**Comment:** Test

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G2) Has your business taken precautions to protect the confidentiality of the disclosed information? If yes, please explain and identify the specific measures, including but</b>			

<p>not limited to internal controls, that your business has taken to protect the information claimed as confidential. If the same or similar information was previously reported to EPA as non-confidential (such as in an earlier version of this submission), please explain the circumstances of that prior submission and reasons for believing the information is nonetheless still confidential.</p>	<p>X</p>		<p><input checked="" type="checkbox"/></p>
<p>Comment: Test</p>			
<p><b>Question</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>CBI</b></p>
<p><b>G3A) Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.</b></p>	<p>X</p>		<p><input type="checkbox"/></p>
<p>Comment: Test</p>			
<p><b>Question</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>CBI</b></p>
<p><b>G3B) 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.</b></p>	<p>X</p>		<p><input type="checkbox"/></p>
<p>Comment: Test</p>			
<p><b>Question</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>CBI</b></p>
<p><b>G3C) 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.</b></p>	<p>X</p>		<p><input type="checkbox"/></p>
<p>Comment: Test</p>			
<p><b>Question</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>CBI</b></p>
<p><b>G4) Is the claim of confidentiality intended to last less than 10 years (see TSCA section 14(e)(1)(B))? If yes, please</b></p>	<p>X</p>		<p><input type="checkbox"/></p>

indicate the number of years (between 1-10 years) or the specific date after which the claim is withdrawn.			
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G5) 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.</b>	X		<input type="checkbox"/>
Comment: Test			
<b>General Claim: <i>Company Name</i></b>			
<b>Applicable Only to General CBI Claims</b>			
<p>A person may assert a claim of confidentiality for the specific chemical identity of a chemical substance as described in § 711.15(b)(3) of this part only if the identity of that chemical substance is treated as confidential in the Master Inventory File as of the time the report is submitted for that chemical substance. Generic chemical identities and accession numbers may not be claimed as confidential. To assert a claim of confidentiality for the identity of a reportable chemical substance, you must submit with the report detailed written answers to the questions from subsection (b) and to the following questions.</p>			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G1) 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.</b>	X		<input type="checkbox"/>
Comment: Test			

Question	Yes	No	CBI
<p><b>G2) 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.</b></p>	X		<input type="checkbox"/>
Comment: Test			
Question	Yes	No	CBI
<p><b>G3A) Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.</b></p>	X		<input type="checkbox"/>
Comment: Test			
Question	Yes	No	CBI
<p><b>G3B) 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.</b></p>	X		<input type="checkbox"/>
Comment: Test			
Question	Yes	No	CBI
<p><b>G3C) 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.</b></p>	X		<input type="checkbox"/>
Comment: Test			

Question	Yes	No	CBI
<b>G4) 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.</b>	X		<input type="checkbox"/>

Comment: Test

Question	Yes	No	CBI
<b>G5) 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.</b>	X		<input type="checkbox"/>

Comment: Test

**General Claim: *Entire Address***

**Applicable Only to General CBI Claims**

A person may assert a claim of confidentiality for the specific chemical identity of a chemical substance as described in § 711.15(b)(3) of this part only if the identity of that chemical substance is treated as confidential in the Master Inventory File as of the time the report is submitted for that chemical substance. Generic chemical identities and accession numbers may not be claimed as confidential. To assert a claim of confidentiality for the identity of a reportable chemical substance, you must submit with the report detailed written answers to the questions from subsection (b) and to the following questions.

Question	Yes	No	CBI
<b>G1) 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,</b>	X		<input type="checkbox"/>

etc.), explain how disclosure of each type of information would be likely to cause substantial harm to the competitive position of your business.			
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G2) 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.</b>	X		<input type="checkbox"/>
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G3A) Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.</b>	X		<input type="checkbox"/>
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G3B) 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.</b>	X		<input type="checkbox"/>
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G3C) 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</b>	X		<input type="checkbox"/>



specific information likely to cause substantial competitive harm? And failure to explain this harm may lead to denial of your confidentiality claim.			
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G4) 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.</b>	X		<input type="checkbox"/>
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G5) 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.</b>	X		<input type="checkbox"/>
Comment: Test			
<b>Chemical Claim: <i>Import Country - Australia</i></b>			
<b>Applicable Only to Chemical Identity CBI Claims</b>			
<p>A person may assert a claim of confidentiality for the specific chemical identity of a chemical substance as described in § 711.15(b)(3) of this part only if the identity of that chemical substance is treated as confidential in the Master Inventory File as of the time the report is submitted for that chemical substance. Generic chemical identities and accession numbers may not be claimed as confidential. To assert a claim of confidentiality for the identity of a reportable chemical substance, you must submit with the report detailed written answers to the questions from subsection (b) and to the following questions.</p>			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>C1) 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</b>			

<p>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].</p>	X		<input type="checkbox"/>
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Comment: Test

Question	Yes	No	CBI
<p>C2) 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.</p>	X		<input type="checkbox"/>

Comment: Test

Question	Yes	No	CBI
<p>C3) 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.</p>	X		<input type="checkbox"/>

Comment: Test

Question	Yes	No	CBI
<p>C4) Would disclosure of the specific chemical identity release confidential process information? If yes, please explain.</p>	X		<input type="checkbox"/>

Comment: Test

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Question	Yes	No	CBI
<p><b>G1) 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.</b></p>	X		<input type="checkbox"/>
<p>Comment: Test</p>			
Question	Yes	No	CBI
<p><b>G2) 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.</b></p>	X		<input type="checkbox"/>
<p>Comment: Test</p>			
Question	Yes	No	CBI
<p><b>G3A) Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.</b></p>	X		<input type="checkbox"/>
<p>Comment: Test</p>			
Question	Yes	No	CBI
<p><b>G3B) Does any of the information claimed as confidential otherwise appear in any public documents, including (but not limited to) safety data sheets; advertising or</b></p>			

<p>promotional material; professional or trade publications; state, local, or Federal agency files; or any other media or publications available to the general public? If yes, please explain why the information should be treated as confidential.</p>	X		<input type="checkbox"/>
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Comment: Test

Question	Yes	No	CBI
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<p>G3C) Has a patent been published for the chemical identity you claim confidential? What chemical identity information is not revealed by the patent? How is release of that specific information likely to cause substantial competitive harm? And failure to explain this harm may lead to denial of your confidentiality claim.</p>	X		<input type="checkbox"/>
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Comment: Test

Question	Yes	No	CBI
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<p>G4) 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.</p>	X		<input type="checkbox"/>
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Comment: Test

Question	Yes	No	CBI
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<p>G5) 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.</p>	X		<input type="checkbox"/>
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Comment: Test

**Chemical Claim: *Export Date - Thu Jan 12 00:00:00 EST 2023***

**Applicable Only to Chemical Identity CBI Claims**

A person may assert a claim of confidentiality for the specific chemical identity of a chemical substance as described in § 711.15(b)(3) of this part only if the identity of that

chemical substance is treated as confidential in the Master Inventory File as of the time the report is submitted for that chemical substance. Generic chemical identities and accession numbers may not be claimed as confidential. To assert a claim of confidentiality for the identity of a reportable chemical substance, you must submit with the report detailed written answers to the questions from subsection (b) and to the following questions.

Question	Yes	No	CBI
<p><b>C1) 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].</b></p>	X		<input type="checkbox"/>
Comment: Test			
Question	Yes	No	CBI
<p><b>C2) 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.</b></p>	X		<input type="checkbox"/>
Comment: Test			
Question	Yes	No	CBI
<p><b>C3) 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</b></p>	X		<input type="checkbox"/>

<p><b>limitations associated with such technologies? Please explain why or why not.</b></p>			
<p>Comment: Test</p>			
<p><b>Question</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>CBI</b></p>
<p><b>C4) Would disclosure of the specific chemical identity release confidential process information? If yes, please explain.</b></p>	<p>X</p>		<p><input type="checkbox"/></p>
<p>Comment: Test</p>			
<p><b>Question</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>CBI</b></p>
<p><b>G1) 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.</b></p>	<p>X</p>		<p><input type="checkbox"/></p>
<p>Comment: Test</p>			
<p><b>Question</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>CBI</b></p>
<p><b>G2) 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.</b></p>	<p>X</p>		<p><input type="checkbox"/></p>
<p>Comment: Test</p>			
<p><b>Question</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>CBI</b></p>

<b>G3A) Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.</b>	<b>X</b>		<input type="checkbox"/>
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G3B) 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.</b>	<b>X</b>		<input type="checkbox"/>
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G3C) 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.</b>	<b>X</b>		<input type="checkbox"/>
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G4) 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.</b>	<b>X</b>		<input type="checkbox"/>
Comment: Test			
<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>CBI</b>
<b>G5) 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</b>	<b>X</b>		<input type="checkbox"/>

<b>entitled to confidential treatment, the entity that made the decision, and the date of the determination.</b>			
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**Comment:** Test

## **TSCA CBI Certification**

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

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

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

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

## **Cross-Media Electronic Reporting Regulation (CROMERR) Certification**

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