

# TSCA Section 5 Premanufacture Notice (PMN)

EPA Form No. 7710-25

OMB Control No. 2070-0038

Expiration 12/31/2025

## CHEMICAL INFORMATION SUBMISSION SYSTEM

TSCA Section 5 Notices and Supports - ePMN

OK

Section 5 of TSCA, EPA's New Chemicals Program, helps manage the potential risk to human health and the environment from chemicals prior to entry to the marketplace. Anyone who plans to manufacture or import a new chemical substance (i.e. one not listed on the TSCA inventory) for a non-exempt commercial purpose is required by Section 5 of TSCA to provide EPA with notice before initiating the activity. A Premanufacture Notice, or PMN, must be submitted at least 90 days prior to the manufacture or import of the chemical. Additional notice types which use the PMN form are listed to reflect different circumstances under which a chemical may be manufactured or imported such as Significant New Use Notices (SNUN), Low Volume Exemptions (LVE), Test Market Exemption Applications (TMEA), and Low Volume and Low Release Exemptions (LoREX). Biotechnology notice forms will be used to submit Microbial Commercial Activity Notices (MCAN), TSCA Experimental Release Applications (TERA), Tier 1 Exemptions, Tier 2 Exemptions, and Biotechnology Test Market Exemption Applications (Biotechnology TMEA). For a PMN or MCAN, the manufacturing or importing company must also notify EPA via a Notice of Commencement within 30 days after the start of the first manufacture or import of the chemical for non-exempt commercial purposes. To determine if a substance is on the TSCA inventory, and therefore excluded from the requirement to provide premanufacturing notification, a submitter may submit a Bona Fide Intent to Manufacture notice ("Bona Fide Notice"). For questions regarding TSCA Section 5 Notices, a pre-submission inquiry can be submitted.

**Please note:** The public reporting and recordkeeping burden for this collection of information is estimated to average 93 hours per response for PMN, SNUN, LVE, and LOREX applications (TMEA is estimated to average 88 hours per response), including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The public reporting and recordkeeping burden for this collection of information is estimated to average 290 hours per response for MCAN applications and the NOC is estimated to average 0.8 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed EPA Form (7710-25) (PMN) or Form 6300-14 (Biotechnology) or Form 7710-56 (NOC) to this address.

The software includes submission forms, embedded help files and a downloadable user manual to guide you through the Section 5 Notices and Supports submission process. Click OK to complete a Section 5 Notices and Supports reporting form, using the Section 5 Notices and Supports software. If you are not reporting on Section 5 Notices and Supports, please select a different application in the drop-down menu.

Paperwork Reduction Act Notice

OMB Control No. 2070-0038  
Expiration 12/31/2025

EPA Form 7710-25

**Paperwork Reduction Act Notice**

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq., and assigned OMB Control No. 2070-0038. Responses to this collection of information are mandatory for certain persons who engage in the covered activities as specified in section 5 of the Toxic Substances Control Act and EPA implementing regulations (40 CFR parts 720 through 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, which varies based on the activity, is estimated to be between 17 to 526 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 Director of the Information Engagement Division, Office of Mission Support, 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.

**Authority**

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



Logged in as: Jane Doe, Primary Authorized Official

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HOME

Forms

The TSCA Section 5 Premanufacture and Significant New Use Notification Electronic Reporting rule requires anyone who intends to manufacture (which includes import) a new chemical substance (i.e., one not listed on the TSCA Inventory) for a non-exempt commercial purpose or to manufacture or process a chemical substance for a significant new use previously designated by EPA to provide EPA with notice before initiating the activity.

Use the following forms to report new chemicals to EPA: Premanufacture Notice form (EPA Form 7710-25) should be used to submit PMNs, LVEs, SNUNs, LOREXs, TMEAs, Modifications for LVEs and LoREX submissions; Biotechnology Notice form (EPA Form 6300-14) should be used to submit MCANs, TERAs, Tier I Exemptions, Tier 2 Exemptions, and Biotechnology TMEAs; Notice of Commencement form (NOC, EPA Form 7710-56) should be used to submit Notices of Commencement for PMNs and MCANs; ACM 40 CFR 721.30 form (TBD) should be used to report proposed Alternative Control Measures for published SNURs; or Bona Fide Notice (TBD) for any requests to determine if a chemical is on the TSCA inventory. The Support form is used to submit supplemental information for Premanufacture and Biotechnology notices, such as Test Data, Correspondences, and Amendments to older submissions.

To determine if a substance is on the TSCA inventory, and therefore excluded from the requirement to provide premanufacturing notification, a submitter may submit a Bona Fide Intent to Manufacture notice ('Bona Fide Notice'). For questions regarding TSCA Section 5 Notices, a pre-submission inquiry can be submitted.

User Management

Manage the access rights of Support persons (including Agents/Consultants) for each Section 5 Notices and Support form.

Resources

Displays links to helpful guidance documents and websites for TSCA and Section 5.

Authorized Official

An Authorized Official has the ability to create, delete, amend, unlock, and submit all Section 5 Notices and Support forms electronically to EPA. The Authorized Official also has the ability to assign Supports (including Agents/Consultants) to individual forms.

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EPA Form 7710-25

Exhibit 3-5 User Management Screen



Logged in as: Jane Doe, Primary Authorized Official

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### USER MANAGEMENT

The Authorized Official is responsible for restricting a Support's access to select forms by assigning or un-assigning them to each form alias. The Support can access and edit only those documents for which the Authorized Official has granted access. Select the form to manage from the drop-down menu and assign a Support to the form by highlighting the individual and clicking the **add** link. To un-assign a Support, highlight the individual and click the **remove** link. To highlight and assign or un-assign multiple Supports, hold down the Ctrl or Shift keys on the keyboard and click each Support before clicking the 'add>>' or '<<remove' link. You must click the **'Save'** button after each change in user assignment.

Form Alias:

Assign Users

Unassigned

Assigned

add >>  
<< remove

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SECTION 5 NOTICES AND SUPPORTS FORMS

- If submitting a form for the first time in the Section 5 Notices and Supports application, select the form type from the drop-down menu and click **Start New Form**.
- Only one Polymer Exemption submission per year should be filed per organization.
- To edit an In Progress form, click the form alias link in the Alias column in the table below.
- To access and edit a form previously submitted through CDX, unlock the form by clicking the lock (🔒) icon and enter the passphrase when prompted. All additional changes made to the form will be submitted as an amendment.
- To download a copy of record for a submitted form, click the green arrow (⬇️) icon and enter the passphrase when prompted.
- You may delete any form that has not yet been submitted by clicking the delete (❌) icon.
- All columns may be sorted by clicking the column header.

40 items found

Page 2 of 2

Go to: 1, 2

Items Per Page: 25

| Alias                             | Type        | Subtype | Case Number | Status      | Modify Date | Submission Date | Action |
|-----------------------------------|-------------|---------|-------------|-------------|-------------|-----------------|--------|
| Primary PMN-20180827-17:38:28 EDT | Primary PMN | PMN     | P-18-0314   | Submitted   | 08/27/2018  | 08/27/2018      | ⬇️🔒    |
| Primary PMN-20180920-12:01:11 EDT | Primary PMN | PMN     | P-18-0366   | Submitted   | 09/20/2018  | 09/20/2018      | ⬇️🔒    |
| Primary PMN-20180929-15:48:48 EDT | Primary PMN | TMEA    |             | In Progress | 09/29/2018  |                 | ❌      |

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|                                         |                   |                   |                                 |                              |            |            |                                                                                                                                                                                                                                                             |
|-----------------------------------------|-------------------|-------------------|---------------------------------|------------------------------|------------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 20180918-16:42:41 EDT                   |                   |                   |                                 |                              |            |            |                                                                                                                                                                                                                                                             |
| Primary PMN-20180919-15:27:10 EDT       | Primary PMN       | LVE               | L-18-0046                       | Submitted                    | 09/19/2018 | 09/19/2018 |                                                                                       |
| Primary PMN-20180919-15:38:18 EDT       | Primary PMN       | PMN               | P-18-0364                       | Submitted                    | 09/19/2018 | 09/19/2018 |    |
| Primary PMN-20180929-11:34:42 EDT       | Primary PMN       |                   |                                 | In Progress                  | 09/29/2018 |            |                                                                                                                                                                          |
| Polymer Exemption-20160707-15:20:37 EDT | Polymer Exemption |                   | Y-16-0020                       | Submitted                    | 08/27/2016 | 08/27/2016 |    |
| Biotechnology-20180913-16:44:55 EDT     | Biotechnology     | MCAN              | J-18-0378, J-18-0379, J-18-0380 | Submitted                    | 09/14/2018 | 09/14/2018 |                                                                                       |
| Biotechnology-20180929-12:23:11 EDT     | Biotechnology     | Biotechnology_TME |                                 | In Progress                  | 09/29/2018 |            |                                                                                                                                                                          |
| NOC-20171012-10:25:02 EDT               | NOC               |                   |                                 | In Progress                  | 10/12/2017 |            |                                                                                                                                                                          |
| Primary PMN-20180307-12:19:46 EST       | Primary PMN       | SNUN              |                                 | In Progress                  | 09/29/2018 |            |                                                                                                                                                                          |
| Primary PMN-20180930-10:51:56 EDT       | Primary PMN       | PMN               | P-18-0390                       | Submitted - Awaiting Payment | 09/30/2018 | 09/30/2018 |    |

Export options:  CSV |  Excel |  XML |  PDF

Select the form type and then click **Start New Form**

Form Type: 

Premanufacture Notice (PMN)

Start New Form

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Exhibit 3-8 Create Passphrase Screen



Logged in as: Jane Doe, Primary Authorized Official  
[Log Out](#)

### CREATE PASSPHRASE

Please create a passphrase that is at least 8 characters in length. To better protect your form, your passphrase should contain a combination of letters and numbers. Your passphrase may include spaces, but should not contain special characters (for example, +, and \*).

New Passphrase:

Confirm New Passphrase:

As an Authorized Official, you are responsible for remembering your passphrase and distributing it to only authorized individuals. Your passphrase will be used as an encryption key to protect the contents of your data. As an Authorized Official, you are responsible for remembering your passphrase and distributing it to only authorized Supports.

**Note: If you lose or forget your passphrase, you will not be able to access your Section 5 Notices and Supports Form to print, submit, or make changes. You will need to complete a new Section 5 Notices and Supports Form and create a new passphrase for the form. For security reasons, the system administrator will not have access to your passphrase and will not be able to retrieve it or reset it.**

Cancel

Next

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Exhibit 3-10 Attach Documents Pop-Up Window

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**ATTACH DOCUMENTS**

---

**Type and Subtype**  
Select the type and subtype of the attachment

Type:

---

**Attachment**  
Select the file to attach

File:

---

**Description**  
Provide a description of the attachment  
*\*\*Please do not include any CBI information in the description of the file information.*

---

**Number of Pages**

pages

---

**CBI**

Check to claim the attachment as CBI ☒

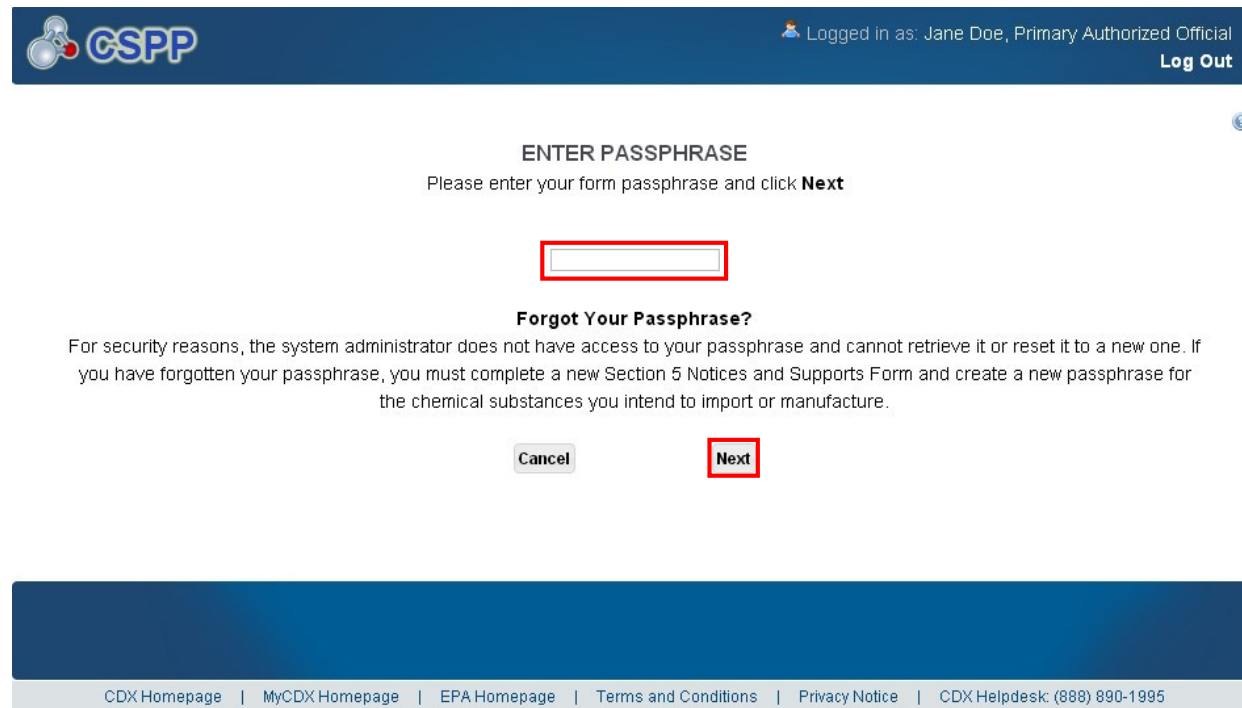
---

**Sanitized Attachment**  
Select the sanitized file to attach

File:

Attachments containing CBI data require a sanitized copy of the attachment not containing any CBI data.

**Exhibit 3-11 Enter Passphrase Screen**



**GSPP** Logged in as: Jane Doe, Primary Authorized Official **Log Out**

**ENTER PASSPHRASE**  
Please enter your form passphrase and click **Next**

**Forgot Your Passphrase?**  
For security reasons, the system administrator does not have access to your passphrase and cannot retrieve it or reset it to a new one. If you have forgotten your passphrase, you must complete a new Section 5 Notices and Supports Form and create a new passphrase for the chemical substances you intend to import or manufacture.

[Cancel](#) [Next](#)

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**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20180914-11:42:28  
EDT

- General Form Information
- Fees Certification
- Agent Information
- Technical Contact Information
- Additional Submission Information
- Chemicals
  - Class 1 or 2
    - Chemical Identification
    - Class 1 or 2 Chemical Substances
    - Additional Chemical Information
    - Production Volume and Hazard/Safety Information
    - Use Information
  - Physical & Chemical Properties
    - Physical and Chemical Properties Worksheet
    - Physical and Chemical Properties Worksheet - Continued (Optional)
- Polymer

**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20180914-11:42:28  
EDT

- Polymer
  - Chemical Identification
  - Polymer Identification Information
    - Monomers and Other Reactants
    - Additional Chemical Information
    - Production Volume and Hazard/Safety Information
    - Use Information
  - Physical & Chemical Properties
    - Physical and Chemical Properties Worksheet
    - Physical and Chemical Properties Worksheet - Continued (Optional)
- Site Information
  - Site Information
  - Sites Controlled By Others

**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20180914-11:42:28  
EDT

- Site Information
  - Site Information
  - Sites Controlled By Others
- Submitter Controlled Operations
  - Operation 1
    - Submitter Operation Information
    - Occupational Exposures
    - Environmental Releases
  - Add Operation
- Operations Controlled by Others
  - Operation 1
    - Industrial Sites Controlled By Others
    - Exposures/Releases
    - Byproduct Information
  - Add Operation
- Optional Pollution Prevention
- Additional Attachments
- Attachment Summary
- Optional Cover Letter
- Joint Submission
  - Joint Submission 1
    - Joint Submitter Information

**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20170728-09:38:48  
EDT

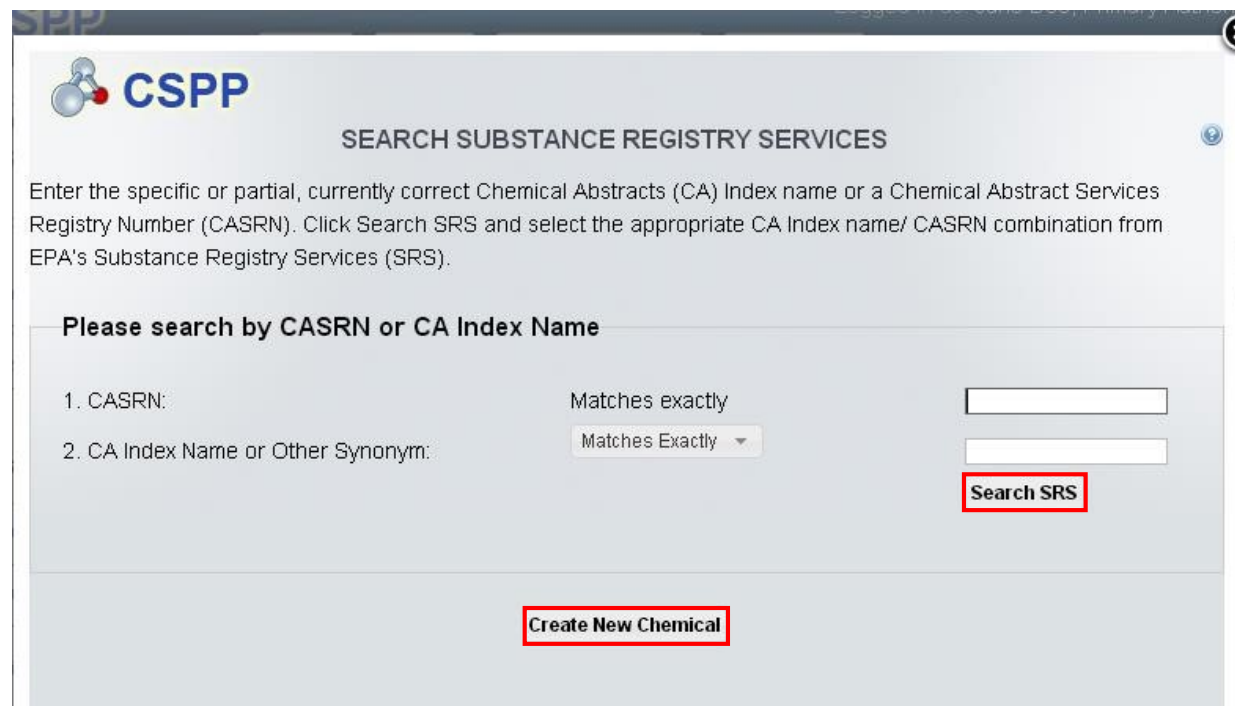
- Attachment Summary
- Optional Cover Letter
- Joint Submission
  - Joint Submission 1
    - Joint Submitter Information
    - Joint Submission Information
  - Add Joint Submission
- Letter of Support
  - Letter of Support 1
    - Letter of Support Submitter Information
    - Letter of Support Submission Information
  - Add Letter of Support
- Submitting Official Information
- CBI Substantiation
  - Instructions for Substantiating CBI Claims

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**Support**  
Primary Authorized Official

Support-20170720-13:06:36 EDT

- General Form Information
- Original Submitter Information
- Submitting Official Information
- CBI Substantiation
  - Instructions for Substantiating CBI Claims



The screenshot shows a web application window titled "CSPP" with a search interface. The main heading is "SEARCH SUBSTANCE REGISTRY SERVICES". Below this, a paragraph instructs the user to enter a Chemical Abstracts (CA) Index name or a Chemical Abstract Services Registry Number (CASRN) and click "Search SRS" to select the appropriate combination from EPA's Substance Registry Services (SRS). The search section is titled "Please search by CASRN or CA Index Name" and contains two input fields. The first field is labeled "1. CASRN:" and has a dropdown menu set to "Matches exactly". The second field is labeled "2. CA Index Name or Other Synonym:" and has a dropdown menu set to "Matches Exactly". Both fields are empty. To the right of the second field is a red-bordered button labeled "Search SRS". At the bottom of the form is a red-bordered button labeled "Create New Chemical".

**CSPP**

### SEARCH SUBSTANCE REGISTRY SERVICES

Enter the specific or partial, currently correct Chemical Abstracts (CA) Index name or a Chemical Abstract Services Registry Number (CASRN). Click Search SRS and select the appropriate CA Index name/ CASRN combination from EPA's Substance Registry Services (SRS).

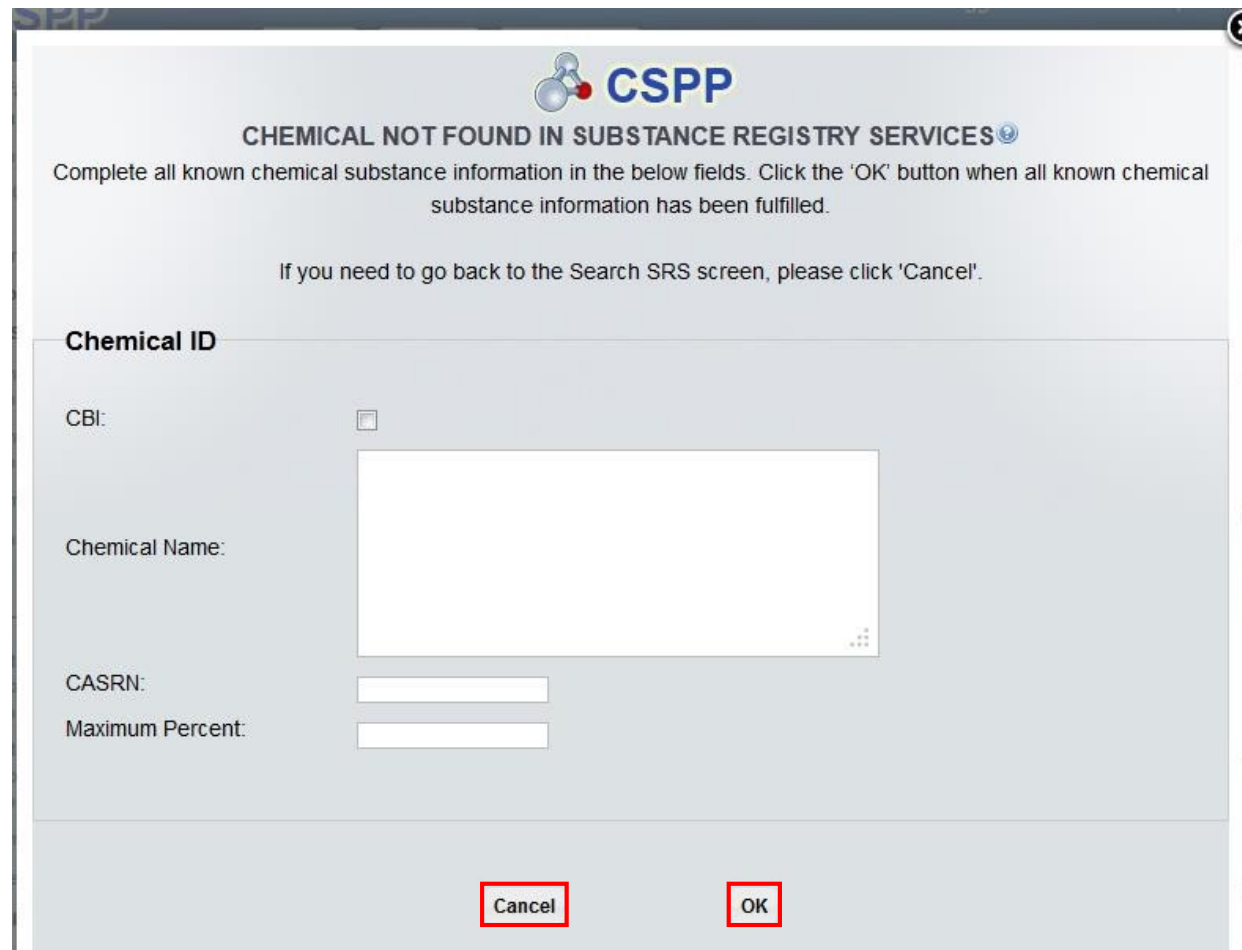
**Please search by CASRN or CA Index Name**

1. CASRN: Matches exactly

2. CA Index Name or Other Synonym: Matches Exactly

**Search SRS**

**Create New Chemical**



The image shows a software window titled "CSPP" with a close button in the top right corner. The window contains the following text and fields:

**CHEMICAL NOT FOUND IN SUBSTANCE REGISTRY SERVICES**

Complete all known chemical substance information in the below fields. Click the 'OK' button when all known chemical substance information has been fulfilled.

If you need to go back to the Search SRS screen, please click 'Cancel'.

**Chemical ID**

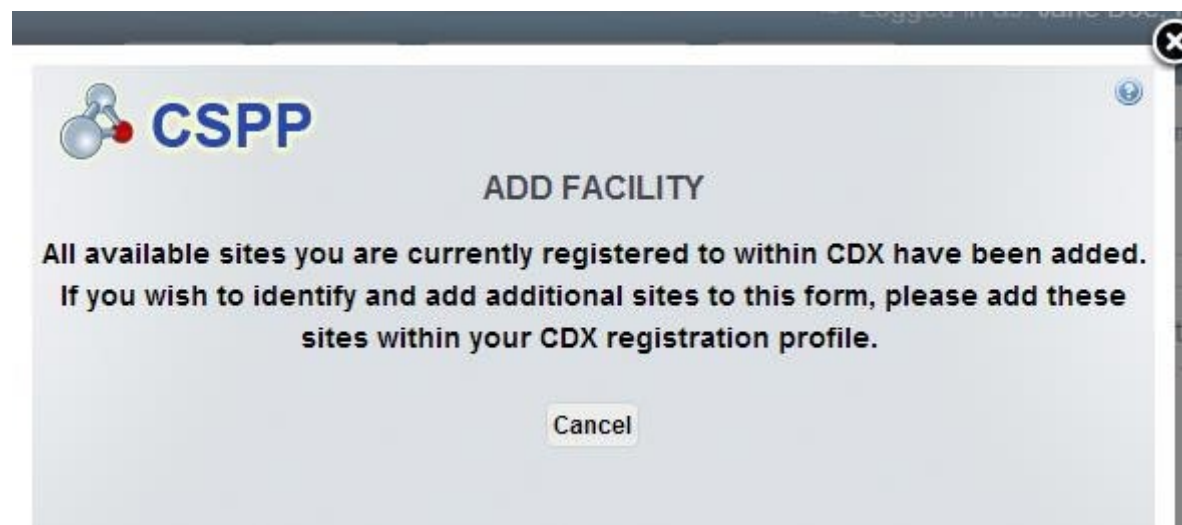
CBI: ☐

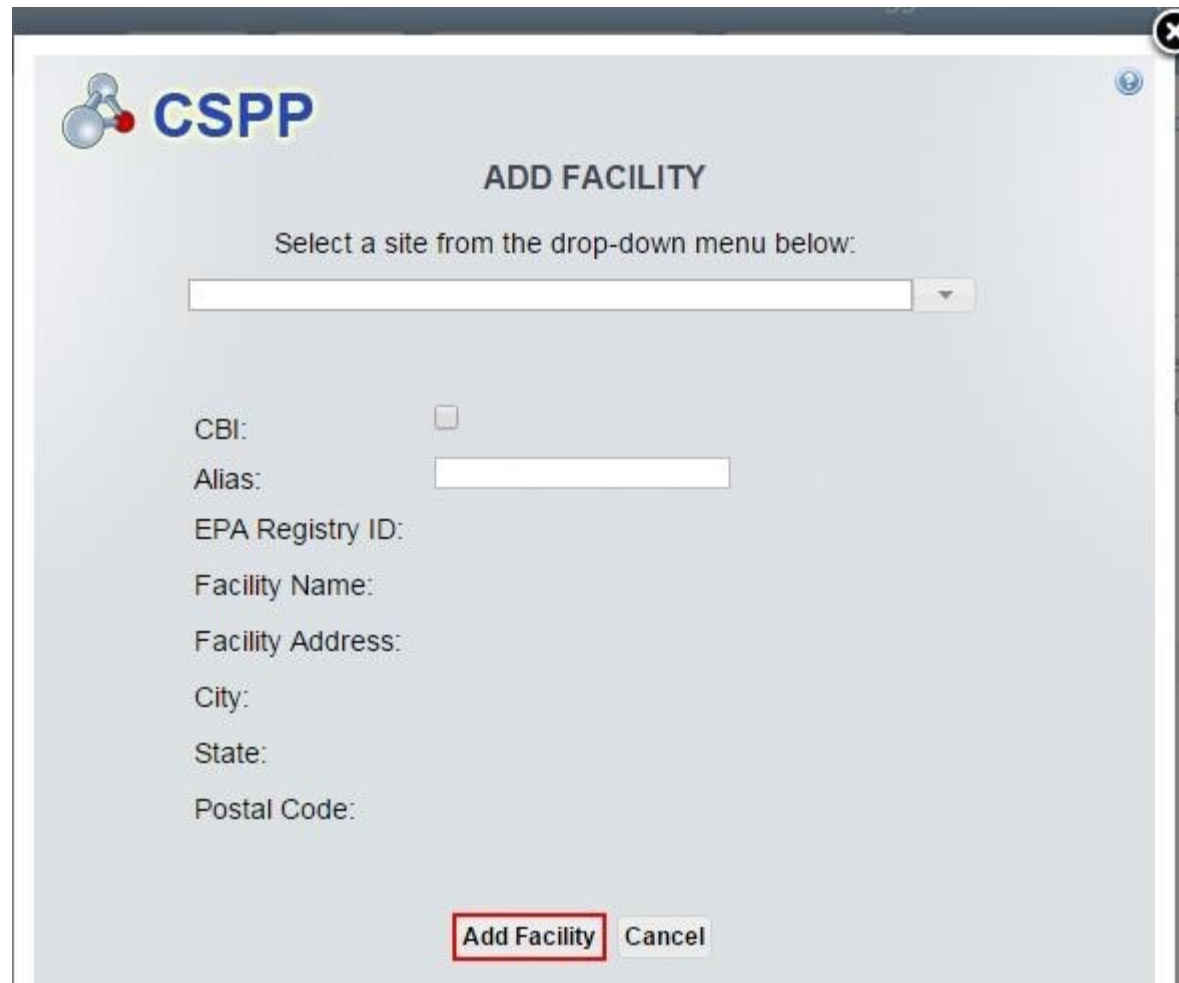
Chemical Name:

CASRN:

Maximum Percent:

At the bottom of the window, there are two buttons: "Cancel" and "OK". Both buttons are highlighted with red rectangular boxes.





The image shows a web-based form titled "ADD FACILITY" from the CSPP (Community Site Profile Project). The form is designed for adding a new facility to a database. It includes a header with the CSPP logo and a close button in the top right corner. The main content area contains a dropdown menu for selecting a site, followed by several text input fields for facility details. A checkbox for "CBI" is also present. At the bottom, there are two buttons: "Add Facility" and "Cancel".

**CSPP**

### ADD FACILITY

Select a site from the drop-down menu below:

CBI: ☐

Alias:

EPA Registry ID:

Facility Name:

Facility Address:

City:

State:

Postal Code:

**Add Facility** Cancel



Logged in as: Jane Doe, Primary Authorized Official  
[Log Out](#)

[Home](#)
[Forms](#)
[User Management](#)
[Resources](#)

Premanufacture Notice  
 Primary Authorized Official  
 Primary PMN-20180830-12:08:59 EDT

Premanufacture Notice (Primary PMN-20180830-12:08:59 EDT) > General Form Information

?

### GENERAL FORM INFORMATION

**This form must be submitted using a United States company or subsidiary with a United States address.**

The form alias is a required field that changes the form name on the **Forms Screen**. Its purpose is to make it easier to distinguish between multiple forms. If an alias is not selected, the field will default to the date it was created. The form alias may be changed at any time.

Form Alias:

**Type of Notice**

Select the **Type of Notice** for the type of form you wish to file.

**PMN Identification**

Please enter the TS Number (if applicable) that references the specific form.

TS Number:

**Test Data**

Select the **Test Data** that will be included in this notice.

|                                                              |                          |                                   |                          |
|--------------------------------------------------------------|--------------------------|-----------------------------------|--------------------------|
| Environmental fate data:                                     | <input type="checkbox"/> | Risk assessments:                 | <input type="checkbox"/> |
| Health effects data:                                         | <input type="checkbox"/> | Structure/Activity relationships: | <input type="checkbox"/> |
| Environmental effects data:                                  | <input type="checkbox"/> | Other data:                       | <input type="checkbox"/> |
| Physical/Chemical properties:                                | <input type="checkbox"/> |                                   |                          |
| Test data not in the possession or control of the submitter: | <input type="checkbox"/> |                                   |                          |

Identify whether any of the below options apply.

Check here if you are filing a joint PMN: ☐

Upload XML

Validate
 Save
 Preview
 Submit

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 [MyCDX Homepage](#) | 
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EPA Form 7710-25

Create the PMN Form



Logged in as: Jane Doe, Primary Authorized Official

Log Out

HomeFormsUser ManagementResources

Premanufacture Notice  
Primary Authorized Official

Primary PMN-20180830-12:08:59  
EDT

General Form Information

Agent Information

Technical Contact Information

Additional Submission Information

Chemicals

Substance A

Chemical Identification

Class 1 or 2 Chemical Substances

Additional Chemical Information

Production Volume and Hazard/Safety Information

Use Information

Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Physical and Chemical Properties Worksheet - Continued (Optional)

Remove

Copy

Add Consolidated Chemical

The form alias is a required field that changes the form name on the **Forms Screen**. Its purpose is to make it easier to distinguish between multiple forms. If an alias is not selected, the field will default to the date it was created. The form alias may be changed at any time.

Form Alias: Primary PMN-20180830-12:08:59 ED

**Type of Notice**  
Select the **Type of Notice** for the type of form you wish to file.

**PMN Identification**  
Please enter the TS Number (if applicable) that references the specific form.  
TS Number:

**Test Data**  
Select the **Test Data** that will be included in this notice.  

|                                                              |                          |                                   |                          |
|--------------------------------------------------------------|--------------------------|-----------------------------------|--------------------------|
| Environmental fate data:                                     | <input type="checkbox"/> | Risk assessments:                 | <input type="checkbox"/> |
| Health effects data:                                         | <input type="checkbox"/> | Structure/Activity relationships: | <input type="checkbox"/> |
| Environmental effects data:                                  | <input type="checkbox"/> | Other data:                       | <input type="checkbox"/> |
| Physical/Chemical properties:                                | <input type="checkbox"/> |                                   |                          |
| Test data not in the possession or control of the submitter: | <input type="checkbox"/> |                                   |                          |

  
Identify whether any of the below options apply.  
Check here if you are filing a joint PMN: ☐  
Check here if you have a Letter of Support pending: ☐

Next

Upload XML

Validate

Save

Preview

Submit

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EPA Form 7710-25

The screenshot shows the EPA Premanufacture Notice (PMN) User Fees Certification form. The top navigation bar includes the GSPP logo, a login status for Jane Doe, and links for Home, Forms, User Management, Resources, and Log Out. The left sidebar contains a tree view of the form sections: General Form Information, User Fees Certification (selected), Agent Information, Technical Contact Information, Additional Submission Information, Chemicals, Class 2 Chemical Substance, Chemical Identification, Class 1 or 2 Chemical Substances, Class 2 Substances, Additional Chemical Information, Production Volume and Hazard/Safety Information, Use Information, Physical & Chemical Properties, and Physical and Chemical. The main content area is titled 'USER FEES CERTIFICATION' and contains instructions for selecting a user fee certification statement. It includes three radio button options for fee remittance. At the bottom, there are buttons for 'Previous' and 'Next' (highlighted with a red box), and a footer with links to CDX, MyCDX, EPA, and other resources.

Logged in as: Jane Doe, Primary Authorized Official  
Log Out

Home Forms User Management Resources

Premanufacture Notice  
Primary Authorized Official

Primary PMN-20140527-12:59:24 EDT

Premanufacture Notice (Primary PMN-20140527-12:59:24 EDT) > User Fees Certification

### USER FEES CERTIFICATION

If a user is submitting a PMN or SNUN, select the user fee certification statement that applies.

If you select Option 2 please note the following statement: Notice(s) for chemical intermediates submitted together in sequence with a final PMN are eligible for a reduced review fee of \$1,000 for each intermediate notice.

#### User Fees Certification

Select the following user fee certification statement that applies:

- ☐ The Company named in Part I, Section A has remitted the fee of \$2500 specified in 40 CFR 700.45(b).
- ☐ The Company named in Part I, Section A has remitted the fee of \$1000 for Intermediate PMN (defined @ 40 CFR 700.43) in accordance with 40 CFR 700.45(b).
- ☐ The Company named in Part 1, Section A is a small business concern under 40 CFR 700.43 and has remitted a fee of \$100 in accordance with 40 CFR 700.45(b).

Previous Next

Upload XML

Validate Save Preview Submit

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The screenshot displays the EPA Premanufacture Notice (PMN) system interface. At the top, the GSPP logo is on the left, and the user is logged in as Jane Doe, Primary Authorized Official, with a Log Out button. A navigation bar includes Home, Forms, User Management, and Resources. The left sidebar shows a tree view of the PMN form sections: General Form Information, Fees Certification (selected), Agent Information, Technical Contact Information, Additional Submission Information, Chemicals, Site Information, Submitter Controlled Operations, and Operations Controlled by Others. The main content area is titled 'Fees Certification' and contains instructions to select a statement that applies. Two radio button options are provided: one for a standard fee of \$16,000.00 and another for a small business concern fee of \$2,800.00. A link to the updated definition of a small business concern is also present. At the bottom of the main area are 'Previous' and 'Next' buttons, with 'Next' highlighted by a red box. The footer bar includes an 'Upload XML' button and icons for Validate, Save, Preview, and Submit. The very bottom of the page contains a footer with links to CDX Homepage, MyCDX Homepage, EPA Homepage, Terms and Conditions, Privacy Notice, and CDX Helpdesk.

Premanufacture Notice  
Primary Authorized Official

Primary PMN-20181010-16:24:42 EDT

General Form Information

**Fees Certification**

Agent Information

Technical Contact Information

Additional Submission Information

Chemicals

Add Consolidated Chemical

Site Information

Site Information

Sites Controlled By Others

Submitter Controlled Operations

Add Operation

Operations Controlled by Others

Premanufacture Notice (Primary PMN-20181010-16:24:42 EDT) > Fees Certification

### FEES CERTIFICATION

Please select the Fees Certification statement that applies. Note that the Fees Certification selections below can not be modified using the submission amendment process.

**Fees Certification**

Select the following Fees Certification statement that applies:

- ☐ The Company named in Part I, Section A will remit the fee of \$16,000.00 as specified in 40 CFR 700.45(c).
- ☐ 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 of \$2,800.00 as specified in 40 CFR 700.45(c).

*\*The criteria for a "small business concern" has been changed in the final fees rule. [View the updated definition of a small business concern](#). A PDF version of the final fees rule is available at [https://www.epa.gov/sites/production/files/2018-09/documents/2018-09-27\\_prepubcopy\\_tsca-fees-finalrule.pdf](https://www.epa.gov/sites/production/files/2018-09/documents/2018-09-27_prepubcopy_tsca-fees-finalrule.pdf).*

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The screenshot displays the EPA Premanufacture Notice (PMN) system interface. At the top, a blue header bar contains the GSP logo, navigation tabs (Home, Forms, User Management, Resources), and a user login status: "Logged in as: Jane Doe, Primary Authorized Official" with a "Log Out" link. The left sidebar shows a tree view of the PMN form sections, including "General Form Information", "Fees Certification", "Agent Information", "Technical Contact Information", "Additional Submission Information", "Chemicals", "Site Information", "Submitter Controlled Operations", "Operations Controlled by Others", "Optional Pollution Prevention", and "Additional Attachments". The main content area is titled "Premanufacture Notice (Primary PMN-20181010-16:24:42 EDT) > Fees Certification" and features a "FEES CERTIFICATION" section. It instructs the user to select a statement that applies, noting that selections cannot be modified after submission. Three radio button options are provided: 1) The Company named in Part I, Section A will remit the fee of \$16,000.00 as specified in 40 CFR 700.45(c). 2) 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 of \$2,800.00 as specified in 40 CFR 700.45(c). 3) 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 \$16,000.00 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). A footnote explains that the criteria for a "small business concern" has been changed in the final fees rule, with a link to the updated definition and a PDF version of the final fees rule. At the bottom of the form, there are "Previous" and "Next" buttons, with "Next" highlighted by a red box. The footer bar includes an "Upload XML" button, icons for "Validate", "Save", "Preview", and "Submit", and a row of links: "CDX Homepage", "MyCDX Homepage", "EPA Homepage", "Terms and Conditions", "Privacy Notice", and "CDX Helpdesk: (888) 890-1995".

Premanufacture Notice (Primary PMN-20181010-16:24:42 EDT) > Fees Certification

### FEES CERTIFICATION

Please select the Fees Certification statement that applies. Note that the Fees Certification selections below can not be modified using the submission amendment process.

**Fees Certification**

Select the following Fees Certification statement that applies:

- ☐ The Company named in Part I, Section A will remit the fee of \$16,000.00 as specified in 40 CFR 700.45(c).
- ☐ 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 of \$2,800.00 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 \$16,000.00 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 criteria for a "small business concern" has been changed in the final fees rule. [View the updated definition of a small business concern](#). A PDF version of the final fees rule is available at [https://www.epa.gov/sites/production/files/2018-09/documents/2018-09-27\\_prepubcopy\\_tsc-fees-finalrule.pdf](https://www.epa.gov/sites/production/files/2018-09/documents/2018-09-27_prepubcopy_tsc-fees-finalrule.pdf).

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**Premanufacture Notice**  
Primary Authorized Official  
Primary PMN-20181010-16:24:42 EDT

General Form Information  
**Fees Certification**  
Agent Information  
Technical Contact Information  
Additional Submission Information  
Chemicals  
Add Consolidated Chemical  
Site Information  
Site Information  
Sites Controlled By Others  
Submitter Controlled Operations  
Add Operation  
Operations Controlled by Others  
Add Operation  
Optional Pollution Prevention  
Additional Attachments  
Attachment Summary  
Optional Cover Letter  
Joint Submission

Premanufacture Notice (Primary PMN-20181010-16:24:42 EDT) > Fees Certification  
**FEES CERTIFICATION**

Please select the Fees Certification statement that applies. Note that the Fees Certification selections below can not be modified using the submission amendment process.

**Fees Certification**

Select the following Fees Certification statement that applies:

- ☐ The Company named in Part I, Section A will remit the fee of \$4,700.00 as specified in 40 CFR 700.45(c).
- ☐ 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 of \$940.00 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 \$4,700.00 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.

*\*The criteria for a "small business concern" has been changed in the final fees rule. [View the updated definition of a small business concern](#). A PDF version of the final fees rule is available at [https://www.epa.gov/sites/production/files/2018-09/documents/2018-09-27\\_prepubcopy\\_tsca-fees-finalrule.pdf](https://www.epa.gov/sites/production/files/2018-09/documents/2018-09-27_prepubcopy_tsca-fees-finalrule.pdf).*

**Previous** **Next**

**Upload XML** **Validate** **Save** **Preview** **Submit**

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## SMALL BUSINESS CONCERN DEFINITION

40 CFR 700.43

*Small business concern* means a manufacturer or processor who meets the size standards identified in the table below. The number of employees indicates the maximum allowed for a manufacturer or processor to be considered small. If the North American Industry Classification System (NAICS) code of a manufacturer or processor is not represented in the table below, it will be considered small if it has 500 or fewer employees. When calculating the number of employees, a manufacturer or processor must include the employees of all companies they "own or control," as defined by 40 CFR 704.3. The number of employees are calculated as the average number of people employed for each pay period of the business' latest 12 calendar months, regardless of hours worked or temporary status.

| Potentially Affected NAICS | NAICS Description                                                   | Small Business Concern Size Standards (# of employees) |
|----------------------------|---------------------------------------------------------------------|--------------------------------------------------------|
| 324110                     | Petroleum Refineries                                                | 1500 or fewer                                          |
| 325110                     | Petrochemical Manufacturing                                         | 1000 or fewer                                          |
| 325120                     | Industrial Gas Manufacturing                                        | 1000 or fewer                                          |
| 325130                     | Synthetic Dye and Pigment Manufacturing                             | 1000 or fewer                                          |
| 325180                     | Other Basic Inorganic Chemical Manufacturing                        | 1000 or fewer                                          |
| 325193                     | Ethyl Alcohol Manufacturing                                         | 1000 or fewer                                          |
| 325194                     | Cyclic Crude, Intermediate, and Gum and Wood Chemical Manufacturing | 1250 or fewer                                          |
| 325199                     | All Other Basic Organic Chemical Manufacturing                      | 1250 or fewer                                          |
| 325211                     | Plastics Material and Resin                                         | 1250 or fewer                                          |

Exhibit 4-11 Agent Information Screen (PMN)



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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20180914-11:42:28 EDT

General Form Information

Fees Certification

Agent Information

Technical Contact Information

Additional Submission Information

Chemicals

Class 1 or 2

Chemical Identification

Class 1 or 2 Chemical Substances

Additional Chemical Information

Production Volume and Hazard/Safety Information

Use Information

Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Premanufacture Notice (Primary PMN-20180914-11:42:28 EDT) > Agent Information

AGENT INFORMATION

To add a new Agent click the **Add Agent** button.

Last Name

First Name

Address

CBI

Actions

Previous

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Exhibit 4-12 Add Agent Pop-Up Window (PMN)

OMB Control No. 2070-0038

Expiration 12/31/2025

**CSPP**

### ADD AGENT

Please enter the information for the agents who will be responsible for supporting the information on the form. Check to claim information as CBI or click the 'Copy CDX Registration' button to populate from CDX (if applicable).

Click here to copy your information from CDX Registration: [Copy CDX Registration](#)

Check here to claim this information as CBI: ☐

First Name:

Last Name:

Position:

Company Name:

Phone Number:   
(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:   
Street address, P.O. box, company name, etc.

Mailing Address 2:   
Apartment, suite, etc.

City:

State:

Postal Code:

Country:

[Cancel](#) [OK](#)



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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20170802-12:01:13  
EDT

General Form Information

Agent Information

Technical Contact Information

Additional Submission Information

Chemicals

Add Consolidated Chemical

Site Information

Site Information

Sites Controlled By Others

Submitter Controlled Operations

Add Operation

Operations Controlled by Others

Add Operation

Optional Pollution Prevention

Additional Attachments

Attachment Summary

Optional Cover Letter

Submitting Official Information

Premanufacture Notice (Primary PMN-20170802-12:01:13 EDT) > Technical Contact Information

TECHNICAL CONTACT INFORMATION

To add a new Technical Contact click the **Add Technical Contact** button.

Last Name

First Name

Address

CBI

Actions

Previous

Next

Upload XML

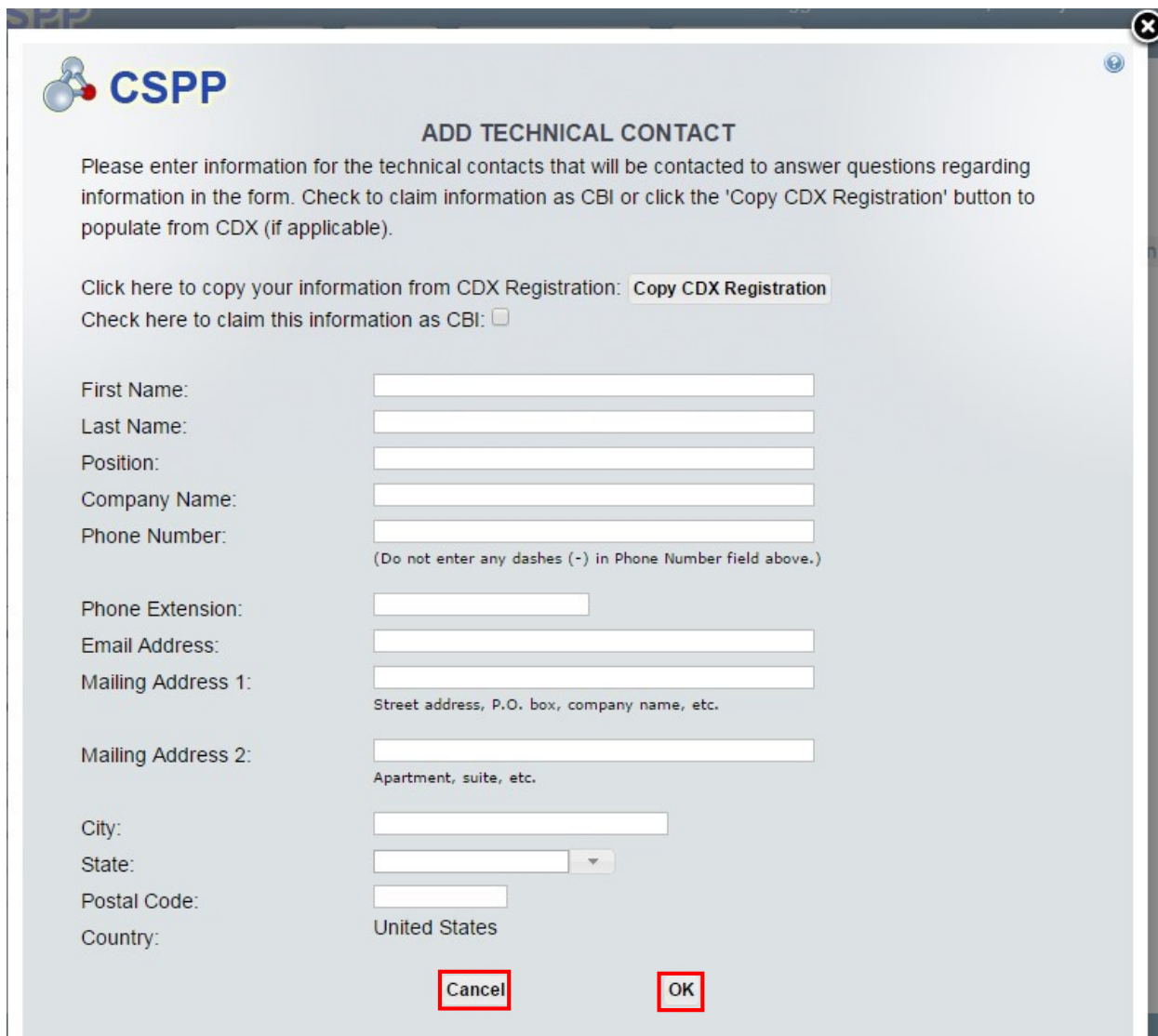
Validate

Save

Preview

Submit

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The screenshot shows a web browser window with a tab labeled 'CSPP'. The page has a header with the CSPP logo (a blue and red molecular structure icon) and the text 'CSPP'. The main heading is 'ADD TECHNICAL CONTACT'. Below this is a paragraph of instructions: 'Please enter information for the technical contacts that will be contacted to answer questions regarding information in the form. Check to claim information as CBI or click the 'Copy CDX Registration' button to populate from CDX (if applicable).' There is a link 'Click here to copy your information from CDX Registration:' followed by a button labeled 'Copy CDX Registration'. Below this is a checkbox labeled 'Check here to claim this information as CBI:'. The form contains several input fields: 'First Name:', 'Last Name:', 'Position:', 'Company Name:', 'Phone Number:', 'Phone Extension:', 'Email Address:', 'Mailing Address 1:', 'Mailing Address 2:', 'City:', 'State:', 'Postal Code:', and 'Country:'. The 'Phone Number' field has a note below it: '(Do not enter any dashes (-) in Phone Number field above.)'. The 'Mailing Address 1' field has a note below it: 'Street address, P.O. box, company name, etc.'. The 'Mailing Address 2' field has a note below it: 'Apartment, suite, etc.'. The 'Country' field is currently set to 'United States'. At the bottom of the form are two buttons: 'Cancel' and 'OK', both of which are highlighted with red rectangular boxes.

**CSPP**

### ADD TECHNICAL CONTACT

Please enter information for the technical contacts that will be contacted to answer questions regarding information in the form. Check to claim information as CBI or click the 'Copy CDX Registration' button to populate from CDX (if applicable).

Click here to copy your information from CDX Registration: [Copy CDX Registration](#)

Check here to claim this information as CBI: ☐

First Name:

Last Name:

Position:

Company Name:

Phone Number:

(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:

Street address, P.O. box, company name, etc.

Mailing Address 2:

Apartment, suite, etc.

City:

State:

Postal Code:

Country:

[Cancel](#) [OK](#)



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**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20141201-11:36:29  
EST

General Form Information

Agent Information

Technical Contact Information

Additional Submission Information

Chemicals

Chemical 5863

Chemical Identification

Class 1 or 2 Chemical Substances

Class 1 or 2 Chemical Substances

Class 2 Substances

Additional Chemical Information

Production Volume and Hazard/Safety Information

Use Information

Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Physical and Chemical

Premanufacture Notice (Primary PMN-20141201-11:36:29 EST) > Additional Submission Information

?

**ADDITIONAL SUBMISSION INFORMATION**

Please enter identification numbers EPA has provided in past communication pertaining to this form. This allows EPA to link the form with previously submitted information.

3. Prenotice Communication Number:

☐ None  
☐ CBI

Prenotice Communication #

Actions

4. Previously Submitted Notice Number:

☐ None  
☐ CBI

Previously Submitted Notice #

Actions

5. Bona Fide Intent Notice Number:

☐ None  
☐ CBI

Bona Fide Intent Notice #

Actions

**Manufacture or Import Options**

Please select whether you intend to manufacture and/or import the chemical(s). Check the binding option if you are willing to submit to being regulated on the option(s) specified.

Manufacture: ☐

Binding: ☐

Import: ☐

Binding: ☐

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OMB Control No. 2070-0038  
Expiration 12/31/2025

EPA Form 7710-25

Exhibit 4-16 Chemical Identification Screen (PMN)

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Home Forms User Management Resources

**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20170731-11:45:56 EDT

**Chemicals**

- Additional Submission Information
- Chemicals**
  - Add Consolidated Chemical
- Site Information**
  - Site Information
  - Sites Controlled By Others
- Submitter Controlled Operations**
  - Add Operation
- Operations Controlled by Others**
  - Add Operation
- Optional Pollution Prevention
- Additional Attachments
- Attachment Summary
- Optional Cover Letter

**Premanufacture Notice (Primary PMN-20170731-11:45:56 EDT) > Chemical Identification**

**CHEMICAL IDENTIFICATION**

**Chemical Type**  
Complete either item 1 (Class 1 or 2 chemical substances, PMN page 4/4a) or item 2 (Polymers, PMN Page 5/5a) as appropriate. Indicate which selection you intend to complete below.

Class 1 or 2 Chemical Substance ☐  
Polymer ☐

**Chemical Alias:**  
\*\*Please do not include any CBI information in the description of the chemical alias

Chemical report folder alias is an optional field that changes the folder name in the navigation tree on the left. The chemical report folder alias is required if a joint submission and/or letter of support is being filed. Its purpose is to make it easier to distinguish between chemical folders when there is more than one and for joint and/or letter of support submitters to refer to when they supply information for that chemical.

\*To add a consolidated chemical, please click the 'Add Consolidated Chemical' link within the navigation tree after you have selected 'Class 1 or 2 Chemical Substance' or 'Polymer' above and then selected 'Next' below.

[Previous](#) [Next](#)

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Agent Information

Technical Contact Information

Additional Submission Information

Chemicals

Chemical 5863

Chemical Identification

Class 1 or 2 Chemical Substances

Additional Chemical Information

Production Volume and Hazard/Safety Information

Use Information

Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Physical and Chemical Properties Worksheet -

Premanufacture Notice (Primary PMN-20141201-11:36:29 EST) > Class 1 or 2 Chemical Substances

CLASS 1 OR 2 CHEMICAL SUBSTANCES

Expand All | Collapse All

Cancel

B.1.a. Class of Substance: ☒ Class 1 ☐ Class 2 CBI: ☐

Click the button below to search EPA's Substance Registry Services (SRS) for the desired chemical.

Search SRS

CASRN:

Chemical Name:

CBI: ☒

B.6. Generic Chemical Name:

B.1.c. ID Method

☒ Method 1 (CAS Inventory Expert Service) ☐ Method 2 (Other Method)

IES Order #:

Include an attachment for the ID Method below.

B.1.d. Molecular Formula:  CBI: ☐

B.1.e. Chemical Structure Diagram:

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Validate

Save

Preview

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Additional Chemical Information

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Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Physical and Chemical Properties Worksheet -

B.1.c. ID Method

☒ Method 1 (CAS Inventory Expert Service) ☐ Method 2 (Other Method)

IES Order #:

Include an attachment for the ID Method below.

B.1.d. Molecular Formula:  CBI: ☐

B.1.e. Chemical Structure Diagram:  
Include an attachment for the chemical structure diagram below.

Choose a section to attach a document:

Attach Document

| Section | File Name | Description | Pages | CBI | Actions |
|---------|-----------|-------------|-------|-----|---------|
|---------|-----------|-------------|-------|-----|---------|

Save

Click the **Add New Chemical** button to add chemical name and structural information for a new chemical.

Add New Chemical

\*Consolidated chemicals are entered by clicking the 'Add Consolidated Chemical' link within the navigation tree on the left.

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Physical and Chemical Properties Worksheet

Physical and Chemical

Premanufacture Notice (Primary PMN-20141201-11:36:29 EST) > Class 2 Substances

CLASS 2 SUBSTANCES

Class 2 Substance Details

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

B.1.e.1. Precursor Substances CBI: ☐

Search SRS

Click the 'Search SRS' button to search EPA's Substance Registry Services (SRS) for a precursor substance or to manually enter the Chemical Name and CASRN (if applicable) if it is not found in SRS.

| Chemical Name | CASRN | Action |
|---------------|-------|--------|
|---------------|-------|--------|

B.1.e.2. Nature of Reaction CBI: ☐

B.1.e.3. Range of Composition CBI: ☐

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Chemical 5863

Chemical Identification

Class 1 or 2 Chemical Substances

Class 2 Substances

Additional Chemical Information

Production Volume and Hazard/Safety Information

Use Information

Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Physical and Chemical

B.1.e.2. Nature of Reaction CBI: ☐

B.1.e.3. Range of Composition CBI: ☐

Attachments

Select which section the attachment applies to and then attach the file.

Click here to attach a file [Attach Document](#)

| Section                                       | File Name | Description | Pages | CBI | Action |
|-----------------------------------------------|-----------|-------------|-------|-----|--------|
| <div><div>Previous</div><div>Next</div></div> |           |             |       |     |        |

Upload XML

Validate

Save

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Class 1 or 2 Chemical Substances

Class 2 Substances

Additional Chemical Information

Production Volume and Hazard/Safety Information

Use Information

Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Physical and Chemical Properties

Premanufacture Notice (Primary PMN-20141201-11:36:29 EST) > Additional Chemical Information

ADDITIONAL CHEMICAL INFORMATION

**B.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 %.

Click the Search SRS button on the right to search SRS or to manually enter an impurity. [Search SRS](#)

| Impurity | CASRN | Maximum% | CBI | Action |
|----------|-------|----------|-----|--------|
|----------|-------|----------|-----|--------|

**B.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.

Click the Search SRS button on the right to search SRS or to manually enter a byproduct. [Search SRS](#)

| Byproduct Name | CASRN | CBI | Action |
|----------------|-------|-----|--------|
|----------------|-------|-----|--------|

**B.4. Synonyms**

CBI: ☐

Enter any chemical synonyms for the new chemical substance.

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Agent Information

Technical Contact Information

Additional Submission Information

Chemicals

- Chemical 5863
  - Chemical Identification
  - Class 1 or 2 Chemical Substances
  - Class 2 Substances
  - Additional Chemical Information
  - Production Volume and Hazard/Safety Information
  - Use Information
  - Physical & Chemical Properties**
    - Physical and Chemical Properties Worksheet
    - Physical and Chemical Properties

| Byproduct Name | CASRN | CBI | Action |
|----------------|-------|-----|--------|
|----------------|-------|-----|--------|

**B.4. Synonyms** CBI: ☐  
Enter any chemical synonyms for the new chemical substance.

| Synonym              | Actions                                                                                                                                                                                                                                                     |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="text"/> |    |

**B.5. Trade Identification** CBI: ☐  
List trade names for the new chemical substance.

| Trade Name           | Actions                                                                                                                                                                                                                                                     |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="text"/> |    |

Attachments  
Select which section the attachment applies to and then attach the file.

Click here to attach a file [Attach Document](#)

| Section | File Name | Description | Pages | CBI | Action |
|---------|-----------|-------------|-------|-----|--------|
|---------|-----------|-------------|-------|-----|--------|

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EPA Form 7710-25

The screenshot displays the EPA Premanufacture Notice (PMN) system interface. At the top, a dark blue header bar contains the CSPP logo, navigation tabs (Home, Forms, User Management, Resources), and a user login status: "Logged in as: Jane Doe, Primary Authorized Official" with a "Log Out" link. Below the header, the main content area is titled "Premanufacture Notice (Primary PMN-20140527-12:59:24 EDT) > Polymer Identification Information". A left sidebar shows a tree view of the PMN form sections, with "Polymer Substance" and "Physical & Chemical Properties" expanded. The main form area is titled "POLYMER IDENTIFICATION INFORMATION" and includes a "Cancel" button and a "Expand All | Collapse All" link. The form contains several sections: a "Search SRS" button with instructions to search EPA's Substance Registry Services; input fields for "CASRN:", "Chemical Name:", "CBI:" (with a checkbox), and "Generic chemical name:"; an "ID Method" section with radio buttons for "Method 1 (CAS Inventory Expert Service)" and "Method 2 (Other Method)", followed by an "IES Order #" field; a "Chemical Structure Diagram" section with instructions to include an attachment; and a "Choose a section to attach a document:" dropdown menu with an "Attach Document" button. At the bottom, a dark blue bar contains an "Upload XML" button, a "Validate" button with a green checkmark icon, and "Save", "Preview", and "Submit" buttons with corresponding icons. The footer of the page lists links for "CDX Homepage", "MyCDX Homepage", "EPA Homepage", "Terms and Conditions", "Privacy Notice", and "CDX Helpdesk: (888) 890-1995".



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HomeFormsUser ManagementResources

Premanufacture Notice  
Primary Authorized Official

Primary PMN-20140527-12:59:24

EDT

Properties  
Worksheet

Physical and  
Chemical  
Properties  
Worksheet -  
Continued  
(Optional)

Remove

Copy

Polymer Substance

Chemical  
Identification

Polymer  
Identification  
Information

Monomers and  
Other Reactants

Additional Chemical  
Information

Production Volume  
and Hazard/Safety  
Information

Use Information

Physical &  
Chemical  
Properties

Physical and  
Chemical

**ID Method**

☒ Method 1 (CAS Inventory Expert Service) ☐ Method 2 (Other Method)

IES Order #:

Include an attachment for the ID Method below.

Chemical Structure Diagram:  
Include an attachment for the chemical structure diagram below.

Choose a section to attach a document:

Attach Document

| Section | File Name | Description | Pages | CBI | Actions |
|---------|-----------|-------------|-------|-----|---------|
|---------|-----------|-------------|-------|-----|---------|

Save

Click the **Add New Chemical** button to add chemical name and structural information for a new chemical.

Add New Chemical

\*Consolidated chemicals are entered by clicking the 'Add Consolidated Chemical' link within the navigation tree on the left.

PreviousNext

Upload XML

 Validate

 Save

 Preview

 Submit

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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20141201-11:36:29 EST

Physical and Chemical Properties Worksheet - Continued (Optional)

Remove

Copy

Chemical 6487

Chemical Identification

Polymer Identification Information

**Monomers and Other Reactants**

Additional Chemical Information

Production Volume and Hazard/Safety Information

Use Information

Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Physical and

Premanufacture Notice (Primary PMN-20141201-11:36:29 EST) > Monomers and Other Reactants

**MONOMERS AND OTHER REACTANTS**

**B.2.a. Polymer Weight Information**

CBI: ☐

Indicate the method of measurement in which the polymer weight was recorded.

Method of Measurement: ☐ GPC ☒ Other(Specify)

Specify other method of measurement:

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.

(i) lowest number avg. molecular weight:

(ii) max. weight % below 500 molecular weight: %

(iii) max. weight % below 1000 molecular weight: %

**B.2.b. Monomers and Other Reactants**

Enter a percent value less than or equal to the maximum weight, do not use ppm units. (1 ppm = 0.0001 wt%).

Select the Add Monomer button to add monomers that make up the polymer composition.

Upload XML

✓

Validate

Save

Preview

Submit

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Premanufacture Notice

Primary Authorized Official

Primary PMN-20141201-

11:36:29 EST

Physical and Chemical Properties Worksheet - Continued (Optional)

Remove

Copy

Chemical 6487

Chemical Identification

Polymer Identification Information

Monomers and Other Reactants

Additional Chemical Information

Production Volume and Hazard/Safety Information

Use Information

Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Physical and

Expand All

Collapse All

Click the button below to search EPA's Substance Registry Services (SRS) for the desired chemical.

Search SRS

Monomer or other reactant:

CAS Registry Number:

Chemical Name:

Typical Composition:

Maximum Residual:

CBI:

CBI:

CBI:

CBI:

CBI:

Save

Cancel

Click the **Add Monomer** button to add a monomer.

Add Monomer

Composition Total:0%

Attachments

Attach Document

| File Name | Description | Pages | CBI | Actions                             |
|-----------|-------------|-------|-----|-------------------------------------|
|           |             |       |     | <div>Previous</div> <div>Next</div> |

Upload XML

Validate

Save

Preview

Submit

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EPA Form 7710-25

CSPP

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Home Forms User Management Resources

Premanufacture Notice  
Primary Authorized Official  
Primary PMN-20140527-12:59:24 EDT

Premanufacture Notice (Primary PMN-20140527-12:59:24 EDT) > Production Volume and Hazard/Safety Information

**PRODUCTION VOLUME AND HAZARD/SAFETY INFORMATION**

On a 100% new chemical substance basis, please provide the following production volume information:

Check the binding option if you are willing to submit to being regulated based on the information provided. LVE submissions that are not bound will be assessed at 10,000 kg production volume.

**C.1. Production Volume** CBI: ☐ Binding: ☐

Maximum **first** 12-month production:  kg/yr  
Maximum 12-month production:  kg/yr

**3. Hazard Information** Binding: ☐

Include in the notice a copy or 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.

Select which section the attachment applies to and then attach the file.

Click here to attach a file **Attach Document**

| Section | File Name | Description | Pages | CBI | Actions |
|---------|-----------|-------------|-------|-----|---------|
|---------|-----------|-------------|-------|-----|---------|

Upload XML

Validate Save Preview Submit

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The screenshot displays the EPA Premanufacture Notice (PMN) system interface. At the top, the header shows the user is logged in as Jane Doe, a Primary Authorized Official, with a 'Log Out' button. The navigation bar includes links for Home, Forms, User Management, and Resources. The left sidebar contains a tree view of the PMN form sections, with 'Class 2 Chemical Substance' selected. The main content area is titled 'USE INFORMATION' and includes a 'Cancel' button. The form contains several sections: a 'Category of Use' section with a 'CBI' checkbox (checked) and a 'Binding' checkbox (unchecked); a 'Generic Use Description' section with a large text area; and a 'Total Production for this Use' section with a percentage input field and a 'CBI' checkbox. Below this is an 'In Formulation' section with a percentage input field and a 'CBI' checkbox. At the bottom, there is a '% of substance expected per use' section with a percentage input field and a 'CBI' checkbox. The footer of the interface includes a 'Validate' button with a green checkmark, a 'Save' button, a 'Preview' button, and a 'Submit' button. The footer also contains links to the CDX Homepage, MyCDX Homepage, EPA Homepage, Terms and Conditions, Privacy Notice, and CDX Helpdesk.

Premanufacture Notice  
Primary Authorized Official

Primary PMN-20140527-12:59:24 EDT

Premanufacture Notice (Primary PMN-20140527-12:59:24 EDT) > Use Information

USE INFORMATION

Expand All | Collapse All

Cancel

If a use is claimed as confidential, the Generic Use Description (public version of the CBI use) field must be completed. As you add use information, it will appear below. Click the 'CBI' checkbox for 'Category of Use' to hide details. (Click on it again to show those details).

Category of Use: CBI: ☒ Binding: ☐  
(by function and application i.e. a dispersive dye for finishing polyester fibers)

C.2.b. Generic Use Description:

Total Production for this Use:  % CBI: ☐

In Formulation:  % CBI: ☐

% of substance expected per use:  CBI: ☐ Binding: ☐

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CSPP

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Log Out

**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20140527-12:59:24 EDT

- General Form Information
- User Fees Certification
- Agent Information
- Technical Contact Information
- Additional Submission Information
- Chemicals**
  - Class 2 Chemical Substance**
    - Chemical Identification
    - Class 1 or 2 Chemical Substances
    - Additional Chemical Information
    - Production Volume and Hazard/Safety Information
    - Use Information
  - Physical & Chemical Properties
    - Physical and Chemical Properties Worksheet
    - Physical and Chemical

% of substance expected per use:
CBI: ☐
Binding: ☐

Site Limited:

%

Consumer\*:

%

Industrial:

%

Commercial:

%

Total:
0
%

\* If you have provided a "consumer" use, provide details: CBI: ☐

Attach Document

| File Name | Description | Pages | CBI | Actions |
|-----------|-------------|-------|-----|---------|
|           |             |       |     |         |

Save

Click the **Add Use** button to populate a Use. Add Use

Production Total:0%

Previous
Next

Upload XML


  
Validate


  
Save


  
Preview


  
Submit

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EPA Form 7710-25



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Home

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Premanufacture Notice  
Primary Authorized Official

Premanufacture Notice (Primary PMN-20140313-10:33:26 EDT) > Physical and Chemical Properties Worksheet

Primary PMN-20140313-10:33:26 EDT

Chemical Identification

Polymer Identification Information

Monomers and Other Reactants

Additional Chemical Information

Production Volume and Hazard/Safety Information

Use Information

**Physical & Chemical Properties**

Physical and Chemical Properties Worksheet

Physical and Chemical Properties Worksheet - Continued (Optional)

Copy

**Polymer Substance**

Chemical Identification

Polymer Identification Information

Monomers and Other Reactants

Additional Chemical Information

PHYSICAL AND CHEMICAL PROPERTIES WORKSHEET

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. 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 should submit this worksheet as a supplement to your submission of test data. This worksheet is not a substitute for submission of test data.

Expand All | Collapse All

|                                                     |      |   |
|-----------------------------------------------------|------|---|
| ▸ Adsorption/ Coefficient                           | Edit | ✖ |
| ▸ Boiling/sublimation temperature @ 1 torr pressure | Edit | ✖ |
| ▸ Density/ relative density                         | Edit | ✖ |
| ▸ Dissociation constant                             | Edit | ✖ |
| ▸ Explodability                                     | Edit | ✖ |
| ▸ Flammability                                      | Edit | ✖ |
| ▸ Henry's Law constant                              | Edit | ✖ |
| ▸ Melting Temperature                               | Edit | ✖ |
| ▸ Octanol/ water partition coefficient              | Edit | ✖ |
| ▸ Particle size distribution                        | Edit | ✖ |
| ▸ Physical state of neat substance                  | Edit | ✖ |
| ▸ pH @ concentration 10                             | Edit | ✖ |
| ▸ Solubility @temperature 15°C solvent              | Edit | ✖ |
| ▸ Solubility in Water @ temperature 15°C            | Edit | ✖ |
| ▸ Spectra                                           | Edit | ✖ |
| ▸ Vapor Pressure @ temperature 15°C                 | Edit | ✖ |
| ▸ Volatilization from water                         | Edit | ✖ |

Upload XML

✓

Validate

 Save

 Preview

 Submit

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**Premanufacture Notice**  
Primary Authorized Official  
Primary PMN-20140313-10:33:26 EDT

[Expand All](#) | [Collapse All](#)

- Chemical Identification
- Polymer Identification Information
- Monomers and Other Reactants
- Additional Chemical Information
- Production Volume and Hazard/Safety Information
- Use Information
- Physical & Chemical Properties**
  - Physical and Chemical Properties Worksheet**
  - Physical and Chemical Properties Worksheet - Continued (Optional)
- Copy
- Polymer Substance**
  - Chemical Identification
  - Polymer Identification Information
  - Monomers and Other Reactants
  - Additional Chemical

substance. Properties that are measured for mixtures or formulations should be so noted (% PMN substance in). 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.

|                                                     |      |   |
|-----------------------------------------------------|------|---|
| ▶ Adsorption/ Coefficient                           | Edit | ✗ |
| ▶ Boiling/sublimation temperature @ 1 torr pressure | Edit | ✗ |
| ▶ Density/ relative density                         | Edit | ✗ |
| ▶ Dissociation constant                             | Edit | ✗ |
| ▶ Explodability                                     | Edit | ✗ |
| ▶ Flammability                                      | Edit | ✗ |
| ▶ Henry's Law constant                              | Edit | ✗ |
| ▶ Melting Temperature                               | Edit | ✗ |
| ▶ Octanol/ water partition coefficient              | Edit | ✗ |
| ▶ Particle size distribution                        | Edit | ✗ |
| ▶ Physical state of neat substance                  | Edit | ✗ |
| ▶ pH @ concentration 10                             | Edit | ✗ |
| ▶ Solubility @temperature 15°C solvent              | Edit | ✗ |
| ▶ Solubility in Water @ temperature 15°C            | Edit | ✗ |
| ▶ Spectra                                           | Edit | ✗ |
| ▶ Vapor Pressure @ temperature 15°C                 | Edit | ✗ |
| ▶ Volatilization from water                         | Edit | ✗ |
| ▶ Volatilization from soil                          | Edit | ✗ |

☒ Validate ☐ Save ☐ Preview ☐ Submit

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Premanufacture Notice

Primary Authorized Official

Primary PMN-20141201-11:36:29 EST

Information

Use Information

Physical & Chemical Properties

Physical and Chemical Properties Worksheet

Physical and Chemical Properties Worksheet - Continued (Optional)

Remove

Copy

Chemical 6487

Chemical Identification

Polymer Identification Information

Monomers and Other Reactants

Additional Chemical Information

Production Volume and Hazard/Safety Information

Premanufacture Notice (Primary PMN-20141201-11:36:29 EST) > Physical and Chemical Properties Worksheet - Continued (Optional)

PHYSICAL AND CHEMICAL PROPERTIES WORKSHEET - CONTINUED (OPTIONAL)

Select the physical/chemical properties that each attachment applies to, browse for a file, and then upload to attach a document to chemical properties.

Attach Document

| File Name | Properties | Description | Pages    | CBI  | Actions |
|-----------|------------|-------------|----------|------|---------|
|           |            |             | Previous | Next |         |

Upload XML

Validate

Save

Preview

Submit

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ATTACH DOCUMENTS

Type and Subtype

Select the type and subtype of the attachment

Type:

Physical Chemical Property

Chemical Properties

Adsorption/ Coefficient

Boiling/ sublimation temperature @

Density/ relative density

Dissociation constant

Explodability

Flammability

Henry's Law constant

Melting Temperature

Octanol/ water partition coefficient

Particle size distribution

Physical state of neat substance

pH @ concentration [concentration]

Solubility @temperature solvent

Solubility in Water @temperature

Spectra

Vapor Pressure @temperature

Volatilization from water

Volatilization from soil

Other Property

Attachment

Select the file to attach

File:

Browse

Description

Provide a description of the attachment

\*\*Please do not include any CBI information in the description of the file information.

Boiling/ sublimation temperature @ ☐  
Density/ relative density ☐  
Dissociation constant ☐  
Explodability ☐  
Flammability ☐  
Henry's Law constant ☐  
Melting Temperature ☐  
Octanol/ water partition coefficient ☐  
Particle size distribution ☐  
Physical state of neat substance ☐  
pH @ concentration [concentration] ☐  
Solubility @temperature solvent ☐  
Solubility in Water @temperature ☐  
Spectra ☐  
Vapor Pressure @temperature ☐  
Volatilization from water ☐  
Volatilization from soil ☐  
Other Property ☐

---

**Attachment**  
Select the file to attach

File:

---

**Description**  
Provide a description of the attachment  
*\*\*Please do not include any CBI information in the description of the file information.*

---

**Number of Pages**  pages

---

**CBI** Check to claim the attachment as CBI ☒

---

**Sanitized Attachment**  
Select the sanitized file to attach

File:

Attachments containing CBI data require a sanitized copy of the attachment not containing any CBI data.

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Exhibit 4-35 Site Information Screen (PMN)



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HomeFormsUser ManagementResources

Premanufacture Notice  
Primary Authorized Official

Primary PMN-20170802-12:01:13

EDT

Physical and Chemical Properties Worksheet - Continued (Optional)

Remove

Copy

Add Consolidated Chemical

Site Information

Site Information

Sites Controlled By Others

Submitter Controlled Operations

Add Operation

Operations Controlled by Others

Add Operation

Optional Pollution Prevention

Additional Attachments

Attachment Summary

Optional Cover Letter

Submitting Official Information

Premanufacture Notice (Primary PMN-20170802-12:01:13 EDT) > Site Information

SITE INFORMATION

1. Do you have sites controlled by the submitter?  
☐ Yes ☐ No

2. Do you have sites controlled by others?  
☐ Yes ☐ No

PreviousNext

Upload XML

Validate

Save

Preview

Submit

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**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20170802-12:01:13 EDT

Premanufacture Notice (Primary PMN-20170802-12:01:13 EDT) > Sites Controlled By Others [?](#)

**SITES CONTROLLED BY OTHERS**

Do you have any sites controlled by others for which you have information to report?  
☒ Yes ☐ No

**B.1.a. Operation description**  
Do you have site-specific information?  
☒ Yes ☐ No

The '# of Unknown Sites' field is required. Enter '0' if none.

# of unknown sites:  CBI: ☐

[Previous](#) [Next](#)

**Physical and Chemical Properties Worksheet - Continued (Optional)**  
[Remove](#)  
[Copy](#)  
[Add Consolidated Chemical](#)

**Site Information**  
[Site Information](#)  
[Sites Controlled By Others](#)

**Submitter Controlled Operations**  
**Operation 1**  
[Submitter Operation Information](#)  
[Occupational Exposures](#)  
[Environmental Releases](#)  
[Remove](#)  
[Add Operation](#)

[Upload XML](#)

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Primary Authorized Official

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11:36:29 EST

Remove

Copy

Add Consolidated  
Chemical

Site Information

- Site Information
- Sites Controlled By  
Others

Submitter Controlled  
Operations

- Operation 1
  - Submitter  
Operation  
Information
  - Occupational  
Exposures
  - Environmental  
Releases
- Add Operation

Operations Controlled by  
Others

- Operation 1
  - Industrial Sites  
Controlled By  
Others
  - Exposures/Releases

Premanufacture Notice (Primary PMN-20141201-11:36:29 EST) > Submitter Operation Information

### SUBMITTER OPERATION INFORMATION

Operation Alias:

The operation alias is a text field that changes the folder name in the navigation tree on the left. Its purpose is to make it easier to distinguish between operations when there is more than one. The operation alias is only required if a letter of support and/or joint submission is pending; otherwise, this field is optional.

Please select the site to report operations on:

Add Facility

| Site Name | Address | City | State | Postal Code | CBI | Actions |
|-----------|---------|------|-------|-------------|-----|---------|
|-----------|---------|------|-------|-------------|-----|---------|

Select the chemical(s) that this submission pertains to:

☐ Chemical 1  
☐ Chemical 2

**A.1.b Operation Type** CBI: ☐

Please select the type of operations present at this site.

Manufacturing: ☒  
Processing: ☐  
Use: ☐

**A.1.c. Operation Description**

Amount and Duration (Complete 1 or 2 as appropriate): CBI: ☐  
Is it batch or continuous?

Upload XML

✓

Validate

Save

Save

Preview

Preview

Submit

Submit

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**Premanufacture Notice**  
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Primary PMN-20160923-  
13:16:47 EDT

[Remove](#)

[Copy](#)

[Add Consolidated Chemical](#)

**Site Information**

[Site Information](#)

[Sites Controlled By Others](#)

**Submitter Controlled Operations**

**Operation 1**

[Submitter Operation Information](#)

[Occupational Exposures](#)

[Environmental Releases](#)

[Add Operation](#)

**Operations Controlled by Others**

[Add Operation](#)

[Optional Pollution Prevention](#)

[Additional Attachments](#)

[Attachment Summary](#)

[Optional Cover Letter](#)

### A.1.c. Operation Description

Amount and Duration (Complete 1 or 2 as appropriate): CBI: ☐

Is it batch or continuous?

☒ 1. Batch ☐ 2. Continuous

max kg/batch:

(100% new chemical substance)

hours/batch:

batches/year:

### A.1.d Process Description

CBI: ☐ Binding: ☐

Please describe the attached process/operation. (optional)

[Attach Document](#)

| File Name                                                                                      | Description | Pages | CBI | Actions |
|------------------------------------------------------------------------------------------------|-------------|-------|-----|---------|
| <a href="#">Previous</a> <a href="#" style="border: 2px solid red; padding: 2px 5px;">Next</a> |             |       |     |         |

[Upload XML](#)

[Validate](#)

[Save](#)

[Preview](#)

[Submit](#)

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The screenshot displays the CSPP (Chemical Safety and Hazard Investigation) web application interface. At the top, a dark blue header bar contains the CSPP logo, navigation tabs (Home, Forms, User Management, Resources), and a user login status: "Logged in as: Jane Doe, Primary Authorized Official" with a "Log Out" link.

The main content area is titled "Premanufacture Notice (Primary PMN-20141201-11:36:29 EST) > Occupational Exposures". Below this, the section "A.2 Occupational Exposure - Submitter Controlled Sites" is active. The left sidebar shows a tree view of the application structure, including "Site Information", "Submitter Controlled Operations", and "Operations Controlled by Others".

The "Occupational Exposures" form is displayed with the following fields and controls:

- Worker Category (1):** A dropdown menu with the selected value "Loading into Transport Containers/Vessels".
- Worker Activity (1):** A dropdown menu.
- Protective Equipment/ Engineering Controls (3):** A large text area for input.
- Physical Form(s) (5):** A text input field.
- % New Substance (5):** A text input field followed by a percentage sign.
- # Workers Exposed (8):** A text input field.
- Maximum Duration**: A section header.
- Hours/Day (10):** A text input field.

On the right side of the form, there are checkboxes for "CBI" and "Binding". At the top right of the form area, there are links for "Expand All" and "Collapse All", and a "Cancel" button with a red X icon.

At the bottom of the application, there is a dark blue footer bar with an "Upload XML" button and four icons representing "Validate", "Save", "Preview", and "Submit". Below this bar, a light gray footer contains links to "CDX Homepage", "MyCDX Homepage", "EPA Homepage", "Terms and Conditions", "Privacy Notice", and "CDX Helpdesk: (888) 890-1995".

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**CSPP**

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Home Forms User Management Resources

Loading into Transport Containers/Vessels

### Premanufacture Notice Primary Authorized Official

Primary PMN-20141201-  
11:36:29 EST

- Copy
- Add Consolidated Chemical
- Site Information**
  - Site Information
  - Sites Controlled By Others
- Submitter Controlled Operations**
  - Operation 1**
    - Submitter Operation Information
    - Occupational Exposures
    - Environmental Releases
    - Add Operation
- Operations Controlled by Others**
  - Operation 1**
    - Industrial Sites Controlled By Others
    - Exposures/Releases
    - Byproduct Information

---

Worker Activity (1):

Protective Equipment/ Engineering Controls (3):

Physical Form(s) (5):  ☐

% New Substance (5):  % ☐

# Workers Exposed (8):  ☐

Maximum Duration ☐

Hours/Day (10):

Days/Year (11):

**Save**

Click the **Add** button to add an occupational exposure. **Add**

**Previous** **Next**

---

**Upload XML**

**Validate** **Save** **Preview** **Submit**

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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20140527-12:59:24 EDT

Add Consolidated Chemical

Site Information

- Site Information
- Sites Controlled By Others

Submitter Controlled Operations

- Operation 1
  - Submitter Operation Information
  - Occupational Exposures
  - Environmental Releases
  - Add Operation

Operations Controlled by Others

- Operation 1
  - Industrial Sites Controlled By Others
  - Exposures/Releases
  - Byproduct Information
  - Remove
  - Add Operation

Premanufacture Notice (Primary PMN-20140527-12:59:24 EDT) > Environmental Releases

ENVIRONMENTAL RELEASES

A.3. Environmental Release and Disposal - Submitter Controlled Sites

Expand All | Collapse All

Cancel

CBI Binding

Release Number (1):

Amount of new substance released

- to Environment (2a): Kg/Day Kg/Batch
- to Control Technology (2b): Kg/Day Kg/Batch

Media of Release (4):

Control Technology Description (5a):

Release after Control Technology (5b):

Save

Upload XML

Validate

Save

Preview

Submit

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OMB Control No. 2070-0038  
Expiration 12/31/2025

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to Control Technology (2D): Kg/Day Kg/Batch

**Premanufacture Notice**  
Primary Authorized Official  
Primary PMN-20140527-12:59:24 EDT

Add Consolidated Chemical

**Site Information**  
Site Information  
Sites Controlled By Others

**Submitter Controlled Operations**  
**Operation 1**  
Submitter Operation Information  
Occupational Exposures  
Environmental Releases  
Add Operation

**Operations Controlled by Others**  
**Operation 1**  
Industrial Sites Controlled By Others  
Exposures/Releases  
Byproduct Information  
Remove  
Add Operation

Media of Release (4): Other  
(If Other, specify):

Control Technology Description (5a):

Release after Control Technology (5b):

Save

Click the **Add** button to add an environmental release and disposal. Add

**A.3.7. Mark the destinations of release to water**  
POTW: Name: NPDES #: CBI:  
Navigable Waterway: Name: NPDES #: CBI:  
Other (Specify): Name: CBI:

Previous Next

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Validate Save Preview Submit

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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20141201-11:36:29 EST

Sites Controlled By Others

Submitter Controlled Operations

Operation 1

Submitter Operation Information

Occupational Exposures

Environmental Releases

Remove

Add Operation

Operations Controlled by Others

Operation 1

Industrial Sites Controlled By Others

Exposures/Releases

Byproduct Information

Add Operation

Optional Pollution Prevention

Additional Attachments

Attachment Summary

Optional Cover Letter

Premanufacture Notice (Primary PMN-20141201-11:36:29 EST) > Industrial Sites Controlled By Others

INDUSTRIAL SITES CONTROLLED BY OTHERS

Operation Alias:

The operation alias is an optional field that changes the folder name in the navigation tree on the left. Its purpose is to make it easier to distinguish between operations when there is more than one. The operation alias is required if a letter of support and/or joint submission is pending.

Please select the site to report operations on:

Add Facility

| Site Name | Address | City | State | Postal Code | CBI | Actions |
|-----------|---------|------|-------|-------------|-----|---------|
|-----------|---------|------|-------|-------------|-----|---------|

Select the chemical(s) that this submission pertains to:

☐ Chemical 1

☐ Chemical 2

Operation Description:  
B.1.b. Please describe the attached process/operation (optional)

CBI: ☐

Attach Document

Upload XML

✓

Validate

Save

Save

Preview

Preview

Submit

Submit

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### Premanufacture Notice

Primary Authorized Official

Primary PMN-20141201-11:36:29 EST

- Sites Controlled By Others
- Submitter Controlled Operations
  - Operation 1
    - Submitter Operation Information
    - Occupational Exposures
    - Environmental Releases
    - Remove
    - Add Operation
- Operations Controlled By Others
  - Operation 1
    - Industrial Sites Controlled By Others
    - Exposures/Releases
    - Byproduct Information
    - Add Operation
- Optional Pollution Prevention
- Additional Attachments
- Attachment Summary
- Optional Cover Letter

The operation alias is an optional field that changes the folder name in the navigation tree on the left. Its purpose is to make it easier to distinguish between operations when there is more than one. The operation alias is required if a letter of support and/or joint submission is pending.

Please select the site to report operations on:

| Add Facility                                                                                                                                                                                                                                                               |             |       |       |             |     |         |           |             |       |     |         |                                                            |  |  |  |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------|-------|-------------|-----|---------|-----------|-------------|-------|-----|---------|------------------------------------------------------------|--|--|--|--|
| Site Name                                                                                                                                                                                                                                                                  | Address     | City  | State | Postal Code | CBI | Actions |           |             |       |     |         |                                                            |  |  |  |  |
| Select the chemical(s) that this submission pertains to:<br><br><input type="checkbox"/> Chemical 1<br><input type="checkbox"/> Chemical 2                                                                                                                                 |             |       |       |             |     |         |           |             |       |     |         |                                                            |  |  |  |  |
| Operation Description:<br>B.1.b. Please describe the attached process/operation (optional)<br>CBI: <input type="checkbox"/><br><br><div></div>                                                                                                                             |             |       |       |             |     |         |           |             |       |     |         |                                                            |  |  |  |  |
| Attach Document <table border="1"> <thead> <tr> <th>File Name</th> <th>Description</th> <th>Pages</th> <th>CBI</th> <th>Actions</th> </tr> </thead> <tbody> <tr> <td colspan="5"> <div> <a href="#">Previous</a> <a href="#">Next</a> </div> </td> </tr> </tbody> </table> |             |       |       |             |     |         | File Name | Description | Pages | CBI | Actions | <div> <a href="#">Previous</a> <a href="#">Next</a> </div> |  |  |  |  |
| File Name                                                                                                                                                                                                                                                                  | Description | Pages | CBI   | Actions     |     |         |           |             |       |     |         |                                                            |  |  |  |  |
| <div> <a href="#">Previous</a> <a href="#">Next</a> </div>                                                                                                                                                                                                                 |             |       |       |             |     |         |           |             |       |     |         |                                                            |  |  |  |  |

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**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20170720-10:45:26 EDT

- General Form Information
- User Fees Certification
- Agent Information
- Technical Contact Information
- Additional Submission Information
- Chemicals**
  - Add Consolidated Chemical
- Site Information**
  - Site Information
  - Sites Controlled By Others
- Submitter Controlled Operations**
  - Add Operation
- Operations Controlled by Others**
  - Operation 1**
    - Industrial Sites Controlled By Others
    - Exposures/Releases**
    - Byproduct Information
    - Add Operation
- Optional Pollution Prevention
- Additional Attachments
- Attachment Summary
- Optional Cover Letter
- Joint Submission**
  - Add Joint Submission
  - Submitting Official Information

Premanufacture Notice (Primary PMN-20170720-10:45:26 EDT) > Exposures/Releases

### EXPOSURES/RELEASES

#### B.2. Worker Exposure/Environmental Release - Sites Controlled by Others

[Expand All](#) | [Collapse All](#)

**Cancel** 

**CBI**  
☐

Letter of Activity (1):

# Workers Exposed (2):

Duration of Exposure  
Hours/Day (4a):

Days/Year (4b):

Protective Equipment/ Engineering Controls (6):

Physical Form (6):

% New Substance (6):  %

% in Formulation (7):  %

**Save**

Click **Add** to add a worker exposure **Add**

Click **Add** to add an environmental disposal **Add**

[Previous](#) [Next](#)

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**Premanufacture Notice**  
Primary Authorized Official  
Primary PMN-20170720-10:45:26 EDT

- General Form Information
- User Fees Certification
- Agent Information
- Technical Contact Information
- Additional Submission Information
- Chemicals**
  - Add Consolidated Chemical
- Site Information**
  - Site Information
  - Sites Controlled By Others
- Submitter Controlled Operations**
  - Add Operation
- Operations Controlled by Others**
  - Operation 1**
    - Industrial Sites Controlled By Others
    - Exposures/Releases**
      - Byproduct Information
      - Add Operation
  - Optional Pollution Prevention
  - Additional Attachments
  - Attachment Summary
  - Optional Cover Letter
- Joint Submission**
  - Add Joint Submission
  - Submitting Official Information

% New Substance (6):  %  
% in Formulation (7):  %  
**Save**

Click **Add** to add a worker exposure **Add**

[Expand All](#) | [Collapse All](#) **Cancel** 

**CBI**  
☐

Release Number (9):

Amt New Substance Released Directly into Environment (10a):  
 ☐ Kg/Day ☐ Kg/Batch

Amt New Substance Released Directly into Control Technology (10b):  
 ☐ Kg/Day ☐ Kg/Batch

Media of Release (12):

Control Technology (12):  
  
**Save**

Click **Add** to add an environmental disposal **Add**

**Previous** **Next**

**Upload XML**    

**Validate** **Save** **Preview** **Submit**

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### Exhibit 4-47 Byproduct Information Screen (PMN)

**CSPP**

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## Premanufacture Notice Primary Authorized Official

Primary PMN-20170802-12:01:13

EDT

- Operation 1
  - Submitter Operation Information
  - Occupational Exposures
  - Environmental Releases
  - Remove
  - Add Operation
- Operations Controlled By Others
  - Operation 1
    - Industrial Sites Controlled By Others
    - Exposures/Releases
    - Byproduct Information
    - Add Operation
  - Optional Pollution Prevention
  - Additional Attachments
  - Attachment Summary
  - Optional Cover Letter
  - Submitting Official Information

◀ Premanufacture Notice (Primary PMN-20170802-12:01:13 EDT) > Byproduct Information ?

### BYPRODUCT INFORMATION

Identify byproducts that may result from the operation. Check the CBI checkbox if the information is confidential.

**B.2.14. Byproducts CBI:** ☐

| Byproduct            | Actions |
|----------------------|---------|
| <input type="text"/> |         |

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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20170731-11:45:56  
EDT

Technical Contact Information

Additional Submission Information

Chemicals

Add Consolidated Chemical

Site Information

Site Information

Sites Controlled By Others

Submitter Controlled Operations

Add Operation

Operations Controlled by Others

Add Operation

Optional Pollution Prevention

Additional Attachments

Attachment Summary

Optional Cover Letter

Submitting Official Information

Premanufacture Notice (Primary PMN-20170731-11:45:56 EDT) > Optional Pollution Prevention

OPTIONAL POLLUTION PREVENTION

In this section you may provide information not reported elsewhere in this form regarding your efforts to reduce or minimize potential risk associated with activities surrounding manufacturing, processing, use, and disposal of the chemical substance.

Please [click here](#) to review additional information that should be included on this page.

Check here to claim this information as CBI: ☐

Attach Document

| File Name | Description | Pages | CBI | Actions |
|-----------|-------------|-------|-----|---------|
|-----------|-------------|-------|-----|---------|

Previous

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OMB Control No. 2070-0038

Expiration 12/31/2025

Logged in as: Jane Doe, Primary Authorized Official

---

**Premanufacture Notice**  
Primary Authorized Official

Primary PMN-20170802-12:01:13 EDT

- Operations Controlled by Others
  - Operation 1
    - Industrial Sites Controlled By Others
    - Exposures/Releases
    - Byproduct Information
    - Remove
    - Add Operation
  - Optional Pollution Prevention
  - Additional Attachments
    - Attachment Summary
    - Optional Cover Letter
- Joint Submission
  - Joint Submission 1
    - Joint Submitter Information
    - Joint Submission Information
    - Remove
    - Add Joint Submission
- Letter of Support

### Premanufacture Notice (Primary PMN-20170802-12:01:13 EDT) > Additional Attachments

## ADDITIONAL ATTACHMENTS

Please use this page to attach documents that are not listed on other parts of the form (test data, EPA correspondence, etc). Please [click here](#) to view a list of commonly attached documents and where they should be attached.

| File Name | Description | Pages                                   | Date                                                               | CBI | Action |
|-----------|-------------|-----------------------------------------|--------------------------------------------------------------------|-----|--------|
|           |             | <input type="button" value="Previous"/> | <input style="border: 2px solid red;" type="button" value="Next"/> |     |        |

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Exhibit 4-50 Attachment Summary Screen (PMN)



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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20170802-12:01:13  
EDT

Operation 1

Industrial Sites Controlled By Others

Exposures/Releases

Byproduct Information

Remove

Add Operation

Optional Pollution Prevention

Additional Attachments

Attachment Summary

Optional Cover Letter

Joint Submission

Joint Submission 1

Joint Submitter Information

Joint Submission Information

Remove

Add Joint Submission

Letter of Support

Letter of Support 1

Premanufacture Notice (Primary PMN-20170802-12:01:13 EDT) > Attachment Summary

ATTACHMENT SUMMARY

The documents included in the form are listed below. The attachments displayed are for viewing purposes only; edits can be made by navigating back to the original page where they were uploaded.

| Section | File Name | Description | Pages | Date | CBI |
|---------|-----------|-------------|-------|------|-----|
|---------|-----------|-------------|-------|------|-----|

Previous

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Exhibit 4-51 Optional Cover Letter Screen (PMN)

The screenshot displays the EPA CDX Premanufacture Notice (PMN) Optional Cover Letter screen. The interface includes a top navigation bar with the CSPP logo, a user login status (Jane Doe, Primary Authorized Official), and a 'Log Out' button. Below the navigation bar, the main content area is titled 'Premanufacture Notice (Primary PMN-20170720-10:45:26 EDT) > Optional Cover Letter'. The left sidebar shows a tree view of the PMN process, including 'Letter of Support' and 'CBI Substantiation'. The main content area contains a text input field for the optional cover letter, a checkbox for claiming CBI information, and a large text area for the cover letter. At the bottom, there are buttons for 'Previous' and 'Next', and a footer with links to CDX Homepage, MyCDX Homepage, EPA Homepage, Terms and Conditions, Privacy Notice, and CDX Helpdesk.

CSPP

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Log Out

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Premanufacture Notice  
Primary Authorized Official

Premanufacture Notice (Primary PMN-20170720-10:45:26 EDT) > Optional Cover Letter

**OPTIONAL COVER LETTER**

If you would like to include text for a cover letter, please use the space below.

Check here to claim this information as CBI: ☐

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CSPP

Logged in as: Jane Doe, Primary Authorized Official

Log Out

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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20170731-11:45:56 EDT

Site Information

Sites Controlled By Others

Submitter Controlled Operations

Add Operation

Operations Controlled by Others

Add Operation

Optional Pollution Prevention

Additional Attachments

Attachment Summary

Optional Cover Letter

Joint Submission

Joint Submission 1

Joint Submitter Information

Joint Submission Information

Add Joint Submission

Letter of Support

Add Letter of Support

Submitting Official Information

Premanufacture Notice (Primary PMN-20170731-11:45:56 EDT) > Joint Submitter Information

JOINT SUBMITTER INFORMATION

Please enter contact information for the joint submitter who will be responsible for providing EPA with PMN information not provided by the main submitter. Check to claim information as CBI.

Check here to claim this information as CBI: ☐

First Name:

Last Name:

Position:

Company Name:

Phone Number:

(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:

Street address, P.O. box, company name, etc.

Mailing Address 2:

Apartment, suite, etc.

City:

State:

Postal Code:

Country:

United States

Previous

Next

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EPA Form 7710-25

**GSPP** Logged in as: Jane Doe, Primary Authorized Official **Log Out**

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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20170731-11:45:56 EDT

Premanufacture Notice (Primary PMN-20170731-11:45:56 EDT) > Joint Submission Information

### JOINT SUBMISSION INFORMATION

Please include instructions you wish the joint submitter to see. Clicking the link below will relay the information in this text box to your joint submitter via [unencrypted e-mail](#).

Unique Identifier for Joint Submission: a629e1b5-ef82-4971-9126-7f7600757535

This is the unique identification number for your joint submitter. [Notify the Secondary Submitter of the Joint Submission](#).

The Secondary Submitter will need this identification number to complete the form. It is your responsibility to ensure that your secondary submitter understands how to complete the PMN form and sends the information to EPA. The information collected in the primary and secondary form(s) will be linked by the unique identifier. The original notice will not undergo a review process until all forms have been received.

Previous **Next**

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Select the chemicals you want to notify the Secondary Submitter with:

- ☐ Chemical 1  
☐ Chemical 2

From: Jane.Doe@test.com

CC:

To:   
Enter email addresses separated by semicolons (;) or commas (.). Click in this box to start entering email addresses.

Subject: 2015 Primary PMN

Message: As the Authorized Official of TEST COMPANY, I have identified you as a Secondary Submitter of a joint submission for this 2015 Premanufacture Notice (PMN) form. Please use the Section 5 Notices and Supports application to provide the correct information for the necessary items in this form. See the instructions below for accessing the Section 5 Notices and Supports application. You will need to use the unique identification number to access and complete the Premanufacture Notice (PMN) form for the joint submission.

Unique Identifier d8d5c29c-5297-4a60-ba29-ad65a59a6a98

Information about the Section 5 programs, how to access the Section 5 Notices and Supports application, and instructions for reporting under the Section 5 rule are available at [www.epa.gov/oppt/newchems/](http://www.epa.gov/oppt/newchems/). For additional information or if you believe you have received this email in error, please contact me.

Additional Comments:

**Send**

OMB Control No. 2070-0038  
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OMB Control No. 2070-0038

Expiration 12/31/2025

CSP

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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20170731-11:45:56 EDT

Additional Attachments

Attachment Summary

Optional Cover Letter

Joint Submission

Joint Submission 1

Joint Submitter Information

Joint Submission Information

Remove

Add Joint Submission

Letter of Support

Letter of Support 1

Letter of Support Submitter Information

Letter of Support Submission Information

Add Letter of Support

Submitting Official Information

CBI Substantiation

Instructions for Substantiating CBI Claims

Premanufacture Notice (Primary PMN-20170731-11:45:56 EDT) > Letter of Support Submitter Information

LETTER OF SUPPORT SUBMITTER INFORMATION

?

Please enter the contact information for the letter of support submitter who will be responsible for providing supporting information to the main PMN submission. Check to claim information as CBI.

Check here to claim this information as CBI: ☐

First Name:

Last Name:

Position:

Company Name:

Phone Number:

(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:

Street address, P.O. box, company name, etc.

Mailing Address 2:

Apartment, suite, etc.

City:

State:

Postal Code:

Country:

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Exhibit 14-17 Submit to CDX Screen



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SUBMIT TO CDX





Validation





Make Payment





PDF Generation





CROMERR





Submit

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.

Cancel

Confirm

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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20170720-10:45:26

EDT

Operations Controlled by Others

- Add Operation
- Optional Pollution Prevention
- Additional Attachments
- Attachment Summary
- Optional Cover Letter

Joint Submission

- Joint Submission 1
  - Joint Submitter Information
  - Joint Submission Information
  - Remove
- Add Joint Submission

Letter of Support

- Letter of Support 1
  - Letter of Support Submitter Information
  - Letter of Support Submission Information
  - Remove
- Add Letter of Support

Submitting Official Information

SUBMITTING OFFICIAL INFORMATION

The information below has been pre-populated from CDX registration. If the information listed is incorrect please make the appropriate edits to your user information in CDX registration.

**This confirmation is required to proceed with the submission process**  
Please confirm that you are the legally responsible party from the submitting company ☐

CBI:

☐

First Name:

Jane

Middle Initial:

Last Name:

Doe

Job Title:

Not Applicable

Company Name:

TEST

Phone Number:

Email Address:

Mailing Address 1:

TEST

Mailing Address 2:

City:

TEST

State:

VA

Postal Code:

22201

Country:

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**Navigation:** Click the 'Validate' icon (✓) located in the bottom action bar to validate the form. Click the 'Save' icon (💾) located in the bottom action bar to perform a global save on the form. Click the 'Preview' icon (🖥️) located in the bottom action bar to view a PDF preview of the form. Click the 'Submit' icon (🗄️+) located in the bottom action bar to begin the submission process.

# Support Form



Logged in as: Jane Doe, Primary Authorized Official  
[Log Out](#)

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Support  
Primary Authorized Official

Support-20170720-13:06:36 EDT

- General Form Information
- Original Submitter Information
- Submitting Official Information
- CBI Substantiation
  - Instructions for Substantiating CBI Claims

Support (Support-20170720-13:06:36 EDT) > General Form Information

GENERAL FORM INFORMATION

The form alias is an optional field that changes the form name on the **Forms Screen**. Its purpose is to make it easier to distinguish between multiple forms. If an alias is not selected, the field will default to the date it was created. The form alias may be changed at any time.

Form Alias:

**I. Original Notice Submission Information**

Case Number:

TS Number:

**IV. Type of Support**

Check if requested by EPA/Contractor: ☐

**V. Description or Explanation of Support** CBI: ☒

[Attach Document](#)

| File Name | Description | Subtype | Pages | CBI | Actions |
|-----------|-------------|---------|-------|-----|---------|
|-----------|-------------|---------|-------|-----|---------|

Next

Validate

Save

Preview

Submit

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EPA Form 7710-25

**CSPP** Logged in as: Jane Doe, Primary Authorized Official [Log Out](#)

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**Support**  
Primary Authorized Official  
Support-20170731-12:13:21 EDT

General Form Information  
Original Submitter Information  
Submitting Official Information  
CBI Substantiation  
Instructions for Substantiating CBI Claims

Support (Support-20170731-12:13:21 EDT) > Original Submitter Information

### ORIGINAL SUBMITTER INFORMATION

Please enter the information of the Authorized Official who submitted the original PMN/Biotect/Bona Fide form for which you are filing a Support document.

Click here to copy your information from CDX Registration: [Copy CDX Registration](#)

Check here to claim this information as CBI: ☐

First Name:

Last Name:

Position:

Company Name:

Phone Number:   
(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:   
Street address, P.O. box, company name, etc.

Mailing Address 2:   
Apartment, suite, etc.

City:

State:

Postal Code:

Country:

[Previous](#) [Next](#)

Validate Save Preview Submit

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**Navigation:** Click the 'Validate' icon (✓) located in the bottom action bar to validate the form. Click the 'Save' icon (📄) located in the bottom action bar to save the overall form. Click the 'Preview' icon (🖨️) located in the bottom action bar to generate a PDF preview of the form.

EPA Form 7710-25



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Log Out

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Support

Primary Authorized Official

Support-20170731-12:13:21 EDT

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SUBMITTING OFFICIAL INFORMATION

The information below has been pre-populated from CDX registration. If the information listed is incorrect please make the appropriate edits to your user information in CDX registration.

CBI:☒

First Name:Jane

Middle Initial:

Last Name:Doe

Job Title:Not Applicable

Company Name:TESTORG

Phone Number:

Email Address:

Mailing Address 1:TEST

Mailing Address 2:

City:TEST

State:AL

Postal Code:12345

Country:US

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# Alternative Control Measures

Exhibit 9-1 Contact Information Screen (ACM)



Logged in as: Jane Doe, Primary Authorized Official

Log Out

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Forms

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Resources

ACM

Primary Authorized Official

ACM-20170807-10:03:24 EDT

Contact Information

Attachments

Submitting Official Information

CBI Substantiation

Instructions for Substantiating CBI Claims

ACM (ACM-20170807-10:03:24 EDT) > Contact Information

CONTACT INFORMATION

You may enter an alias for easier form identification or the system will provide a time stamp.

Form Alias:

To add a new Contact click the **Add Contact** button.

| Last Name       | First Name | Address | CBI | Actions |
|-----------------|------------|---------|-----|---------|
| <div>Next</div> |            |         |     |         |

✓

Validate

📄

Save

🖨

Preview

💾

Submit

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Exhibit 9-2 Add Contact Pop-Up Window (ACM)

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**CSPP**

### ADD CONTACT

Please enter the information for the contacts who will be responsible for supporting the information on the form. For multiple contacts, click the **Add Contact** button to populate a table with multiple contacts. Check to claim information as CBI or to populate from CDX (if applicable).

Click here to copy your information from CDX Registration: [Copy CDX Registration](#)

Check here to claim this information as CBI: ☐

First Name:

Last Name:

Company Name:

Phone Number:   
(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:   
Street address, P.O. box, company name, etc.

Mailing Address 2:   
Apartment, suite, etc.

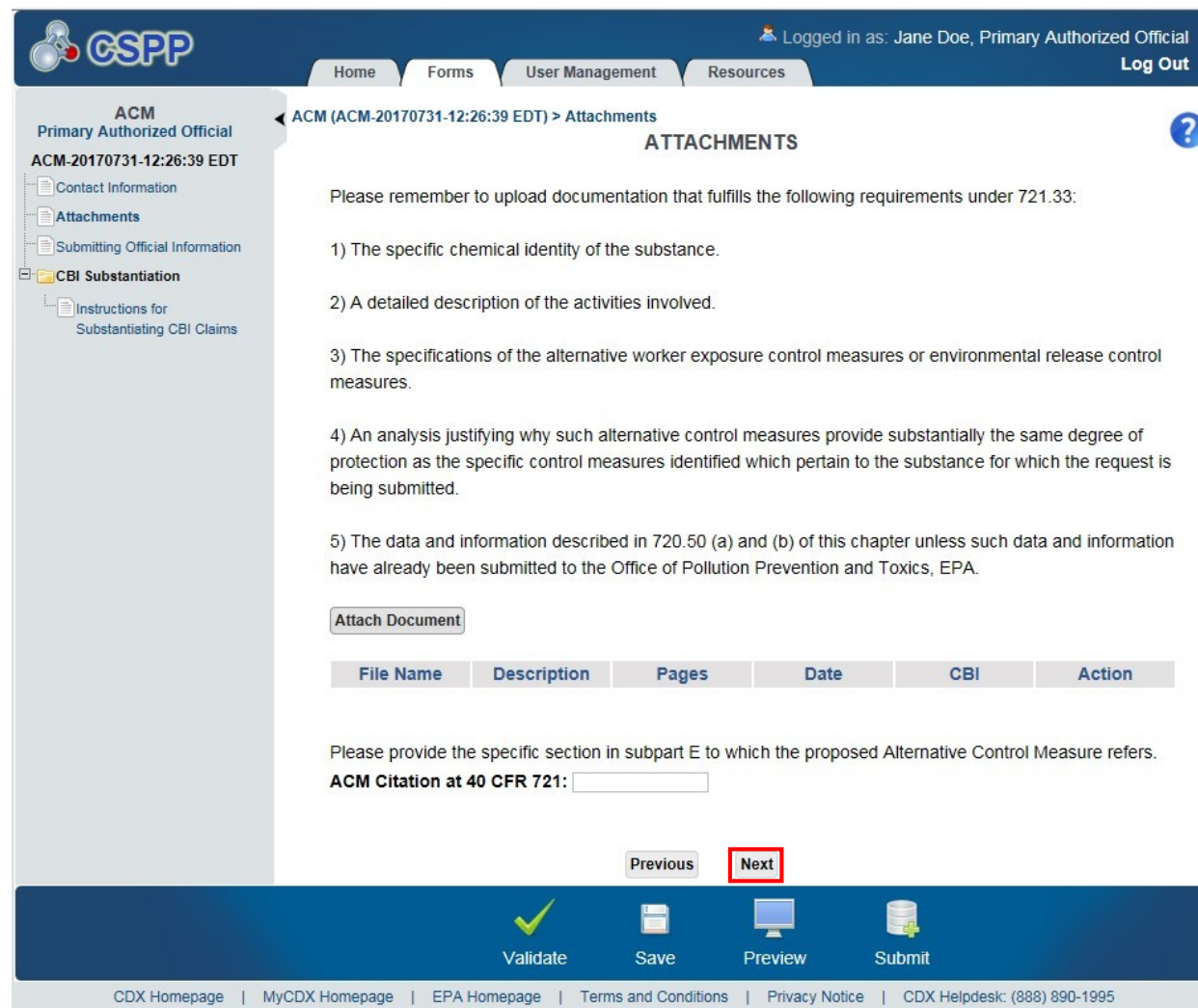
City:

State:

Postal Code:

Country:

Exhibit 9-3 Attachments Screen (ACM)



The screenshot displays the GSPP (Global Site Performance Portal) interface. At the top, a navigation bar includes links for Home, Forms, User Management, and Resources, along with a user login status: "Logged in as: Jane Doe, Primary Authorized Official" and a "Log Out" button. The left sidebar shows a tree view of the application structure, with "ACM" selected. The main content area is titled "ATTACHMENTS" and contains instructions for uploading documentation. It lists five requirements for the submission, followed by an "Attach Document" button. Below this is a table with columns for File Name, Description, Pages, Date, CBI, and Action. The table is currently empty. Below the table, there is a text input field for "ACM Citation at 40 CFR 721:". At the bottom of the form, there are "Previous" and "Next" buttons, with "Next" highlighted by a red box. The footer of the page contains a row of icons for Validate, Save, Preview, and Submit, and a footer bar with links to CDX Homepage, MyCDX Homepage, EPA Homepage, Terms and Conditions, Privacy Notice, and CDX Helpdesk: (888) 890-1995.

ACM  
Primary Authorized Official  
ACM-20170731-12:26:39 EDT

ACM (ACM-20170731-12:26:39 EDT) > Attachments

**ATTACHMENTS**

Please remember to upload documentation that fulfills the following requirements under 721.33:

- 1) The specific chemical identity of the substance.
- 2) A detailed description of the activities involved.
- 3) The specifications of the alternative worker exposure control measures or environmental release control measures.
- 4) An analysis justifying why such alternative control measures provide substantially the same degree of protection as the specific control measures identified which pertain to the substance for which the request is being submitted.
- 5) The data and information described in 720.50 (a) and (b) of this chapter unless such data and information have already been submitted to the Office of Pollution Prevention and Toxics, EPA.

Attach Document

| File Name | Description | Pages | Date | CBI | Action |
|-----------|-------------|-------|------|-----|--------|
|-----------|-------------|-------|------|-----|--------|

Please provide the specific section in subpart E to which the proposed Alternative Control Measure refers.  
**ACM Citation at 40 CFR 721:**

Previous **Next**

Validate Save Preview Submit

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Exhibit 10-1 Preview EPMN Form Screen (ACM)

**GSPP** Logged in as: Jane Doe, Primary Authorized Official **Log Out**

Home Forms User Management Resources

**ACM**  
Primary Authorized Official  
ACM-20170720-14:53:35 EDT

- Contact Information
- Attachments
- Submitting Official Information
- CBI Substantiation**
  - Instructions for Substantiating CBI Claims

**PREVIEW EPMN FORM**

Please choose a Regular or Sanitized PDF.

**Full Version** **Sanitized Version**

**Note:** If you make no CBI claims, the two versions will be the same.

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# TSCA Section 5 Bona Fide/Polymer Exemption

**Bona Fide**  
Primary Authorized Official  
Bona Fide-20170720-13:27:12  
EDT

- General Document Information
- Primary Contact Information
- Technical Contact Information
- Statement of Intent
- Letter of Support
  - Letter of Support Submitter Information
  - Letter of Support Submission Information
- Chemical
  - Chemical Identification Information
  - Chemical 101889
    - Class 1 or 2/Biotechnology Chemical Substances
    - Class 2/Biotechnology Substances
    - Use Information
- Site Information
  - Submitter Site Identification
- Document Management
- Optional Cover Letter
- Submitting Official Information
- CBI Substantiation
  - Instructions for Substantiating CBI Claims

**Bona Fide**  
Primary Authorized Official  
Bona Fide-20170720-13:27:12  
EDT

- General Document Information
- Primary Contact Information
- Technical Contact Information
- Statement of Intent
- Letter of Support
  - Letter of Support Submitter Information
  - Letter of Support Submission Information
- Chemical
  - Chemical Identification Information
  - Chemical 102121
    - Polymer Identification Information
    - Monomers and Other Reactants
    - Use Information
- Site Information
  - Submitter Site Identification
- Document Management
- Optional Cover Letter
- Submitting Official Information
- CBI Substantiation
  - Instructions for Substantiating CBI Claims

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**ACM**  
Primary Authorized Official  
ACM-20170720-14:53:35 EDT

- Contact Information
- Attachments
- Submitting Official Information
- CBI Substantiation
  - Instructions for Substantiating CBI Claims

The screenshot shows the EPA CDX Bona Fide form interface. At the top, the GSP logo is on the left, and the user is logged in as 'Jane Doe, Primary Authorized Official' on the right. Below the header is a navigation bar with links for Home, Forms, User Management, and Resources. The main content area is titled 'Bona Fide (Bona Fide-20170807-09:41:08 EDT) > General Document Information'. On the left is a sidebar menu with categories like General Document Information, Letter of Support, Chemical, Site Information, and CBI Substantiation. The main form area is titled 'GENERAL DOCUMENT INFORMATION' and contains several sections: a description of the form alias, a 'Form Alias' field with the value 'Bona Fide-20170807-09:41:08 EDT', a checkbox for claiming the submission as Confidential Business Information (CBI) which is checked, a section for technical contact information with a checked 'Technical Contact' checkbox, and a final section about the Letter of Support screen. At the bottom of the form are four buttons: Validate, Save, Preview, and Submit. A footer bar contains links to CDX Homepage, MyCDX Homepage, EPA Homepage, Terms and Conditions, Privacy Notice, and CDX Helpdesk.

**Bona Fide**  
Primary Authorized Official  
Bona Fide-20170807-09:41:08 EDT

General Document Information

Primary Contact Information

Technical Contact Information

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Letter of Support

Letter of Support Submitter Information

Letter of Support Submission Information

Chemical

Chemical Identification Information

Site Information

Submitter Site Identification

Document Management

Optional Cover Letter

Submitting Official Information

CBI Substantiation

Instructions for Substantiating CBI Claims

Bona Fide (Bona Fide-20170807-09:41:08 EDT) > General Document Information

**GENERAL DOCUMENT INFORMATION**

The form alias is a required field that allows the user to give the Bona Fide a name to be displayed in the 'Alias' field on the Section 5 Notices and Supports Forms screen. Its purpose is to make it easier for you to distinguish between multiple forms. If an alias is not selected, the field will default to the date and time the Bona Fide was created. The form alias may be changed at any time.

Form Alias: Bona Fide-20170807-09:41:08 EDT

Please check all applicable checkboxes below:

This Bona Fide Notice can be claimed entirely as Confidential Business Information (CBI). Please check the 'I claim the entirety of the submission as CBI' checkbox to claim your entire submission as CBI.

**I claim the entirety of the submission as CBI:** ☒

The technical contact is a subject matter expert (SME) who is capable of answering questions related to the chemical within the Bona Fide. The technical contact does not have to physically work at the site reported but must possess extensive knowledge on the chemical reported in order to answer EPA's questions pertaining to the submission. Please check the 'Technical Contact' checkbox below to identify a technical contact for your submission.

**Technical Contact:** ☒

The 'Letter of Support' screen is used to enter contact information regarding the Letter of Support submitter who will submit information separately for the Bona Fide. The email address will be used to send the

Validate Save Preview Submit

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Logged in as: Jane Doe, Primary Authorized Official  
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**Bona Fide**  
Primary Authorized Official  
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Chemical

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Instructions for Substantiating CBI Claims

This Bona Fide Notice can be claimed entirely as Confidential Business Information (CBI). Please check the 'I claim the entirety of the submission as CBI' checkbox to claim your entire submission as CBI.

**I claim the entirety of the submission as CBI:** ☒

The technical contact is a subject matter expert (SME) who is capable of answering questions related to the chemical within the Bona Fide. The technical contact does not have to physically work at the site reported but must possess extensive knowledge on the chemical reported in order to answer EPA's questions pertaining to the submission. Please check the 'Technical Contact' checkbox below to identify a technical contact for your submission.

**Technical Contact:** ☒

The 'Letter of Support' screen is used to enter contact information regarding the Letter of Support submitter who will submit information separately for the Bona Fide. The email address will be used to send the secondary submitter the unique identification number to tie the Letter of Support, completed by the secondary submitter, to the primary Bona Fide completed by the primary submitter. Please check the 'Letter of Support' checkbox below to identify a Letter of Support submitter.

**Letter of Support:** ☒

[Next](#)

 [Validate](#)

 [Save](#)

 [Preview](#)

 [Submit](#)

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Logged in as: Jane Doe, Primary Authorized Official  
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**Bona Fide**  
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- Chemical Identification Information

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Bona Fide (Bona Fide-20170720-13:27:12 EDT) > Primary Contact Information

PRIMARY CONTACT INFORMATION

The primary contact fields have been pre-populated based on the information you provided during CDX registration but may be edited if necessary. The 'Job Title' field is required.

Prefix:

Miss

First Name:

Jane

Middle Initial:

Last Name:

Doe

Suffix:

Title:

Company Name:

TEST

Phone Number:

(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:

TEST

Street address, P.O. box, company name, etc.

Mailing Address 2:

Apartment, suite, etc.

City:

TEST

State:

Virginia

Postal Code:

22201

Country:

United States

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Bona Fide

Primary Authorized Official

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Bona Fide (Bona Fide-20170807-09:41:08 EDT) > Technical Contact Information

TECHNICAL CONTACT INFORMATION

?

Please enter the information for the technical contact who will be responsible for providing additional information if required.

Prefix:

First Name:

Middle Initial:

Last Name:

Suffix:

Title:

Company Name:

Phone Number:

(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:

Street address, P.O. box, company name, etc.

Mailing Address 2:

Apartment, suite, etc.

✓

Validate

💾

Save

🖨

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📤

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Last Name:

Suffix:

Title:

Company Name:

Phone Number:  
(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:  
Street address, P.O. box, company name, etc.

Mailing Address 2:  
Apartment, suite, etc.

City:

State:

Postal Code:

Country:

Previous

Next

✓  
Validate

  
Save

  
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Submit

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Bona Fide (Bona Fide-20171010-14:35:14 EDT) > Statement of Intent

?

STATEMENT OF INTENT

Please select whether you intend to manufacture and/or import the chemical.

Manufacture: ☐

Import: ☐

Date of expected Section 5 notification if the result is that the chemical is not on the inventory.

Previous

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🖥️

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💾

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Substantiating CBI Claims

Bona Fide (Bona Fide-20171010-14:35:14 EDT) > Letter of Support Submitter Information

?

**LETTER OF SUPPORT SUBMITTER INFORMATION**

Please enter the contact information for the Letter of Support submitter who will be completing the Letter of Support.

Prefix:

First Name:

Middle Initial:

Last Name:

Suffix:

Title:

Company Name:

Phone Number:

(Do not enter any dashes (-) in Phone Number field above.)

Phone Extension:

Email Address:

Mailing Address 1:

Street address, P.O. box, company name, etc.

Mailing Address 2:

Apartment, suite, etc.

City:

State:

Postal Code:

Country:

Previous

Next

✓

Validate

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Bona Fide (Bona Fide-20170720-13:27:12 EDT) > Letter of Support Submission Information

LETTER OF SUPPORT SUBMISSION INFORMATION

Please include instructions you wish the Letter of Support submitter to see. Clicking the link below will relay the information in this text box to your Letter of Support submitter via unencrypted e-mail.

Unique Identifier for Letter of Support Submission: a44c8d27-bf90-42b6-91c2-2692412a14ba

This is the unique identification number for your joint submitter. [Notify the Secondary Submitter of the letter of support submission.](#)

The Secondary Submitter will need this identification number to complete the form. It is your responsibility to ensure that your secondary submitter understands how to complete the Bona Fide form and sends the information to EPA by the end of the submission period. The information collected in the primary and secondary form(s) will be linked by the unique identifier. The form will not undergo a review process until all forms have been received.

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|                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| From:                               | Jane.Doe@test.com                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| CC:                                 | <input type="text"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| To:                                 | <input type="text"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Subject:                            | 2015 Bona Fide                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Message:                            | <p>As the Authorized Official of TEST COMPANY, I have identified you as a Secondary Submitter of a letter of support submission for this 2015 Bona Fide form. Please use the Section 5 Notices and Supports application to provide the correct information for the necessary items in this form. See the instructions below for accessing the Section 5 Notices and Supports application. You will need to use the unique identification number to access and complete the Bona Fide form for the letter of support submission.</p> <p>Unique Identifier 9f30ac20-83ad-4320-a1a1-488a22f1a7ce</p> <p>Information about the Section 5 programs, how to access the Section 5 Notices and Supports application, and instructions for reporting under the Section 5 rule are available at <a href="http://www.epa.gov/oppt/newchems/">www.epa.gov/oppt/newchems/</a>. For additional information or if you believe you have received this email in error, please contact me.</p> |
| Additional Comments:                | <input type="text"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <input type="button" value="Send"/> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

EPA Form 7710-25

The screenshot displays the EPA Form 7710-25 web interface. At the top, a dark blue header bar contains the GSPP logo on the left, navigation tabs for Home, Forms, User Management, and Resources in the center, and a user status bar on the right indicating 'Logged in as: Jane Doe, Primary Authorized Official' with a 'Log Out' link. Below the header, a left-hand navigation pane shows a tree structure of document sections: General Document Information, Primary Contact Information, Technical Contact Information, Statement of Intent, Letter of Support (with sub-items for Submitter and Submission Information), Chemical (with sub-item for Chemical Identification Information), Site Information (with sub-items for Submitter Site Identification, Document Management, Optional Cover Letter, and Submitting Official Information), and CBI Substantiation (with sub-item for Instructions for Substantiating CBI Claims). The main content area is titled 'Bona Fide (Bona Fide-20171010-14:35:14 EDT) > Chemical Identification Information' and features a 'CHEMICAL IDENTIFICATION INFORMATION' heading. Under 'Chemical Type', users are instructed to complete either item 1 (Class 1 or 2/Biotechnology Chemical Substance) or 2 (Polymer) and are presented with two radio button options. Below this, the 'Chemical Alias' section includes a text input field and an explanatory note. At the bottom of the main content area are 'Previous' and 'Next' buttons, with the 'Next' button highlighted by a red rectangle. A dark blue footer bar contains four action buttons: 'Validate' (with a green checkmark icon), 'Save' (with a floppy disk icon), 'Preview' (with a monitor icon), and 'Submit' (with a database cylinder icon). The very bottom of the page features a light gray bar with a series of links: CDX Homepage, MyCDX Homepage, EPA Homepage, Terms and Conditions, Privacy Notice, and CDX Helpdesk (888) 890-1995.

GSPP

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Home Forms User Management Resources

Bona Fide  
Primary Authorized Official  
Bona Fide-20171010-14:35:14 EDT

General Document Information  
Primary Contact Information  
Technical Contact Information  
Statement of Intent  
Letter of Support  
Letter of Support Submitter Information  
Letter of Support Submission Information  
Chemical  
Chemical Identification Information  
Site Information  
Submitter Site Identification  
Document Management  
Optional Cover Letter  
Submitting Official Information  
CBI Substantiation  
Instructions for Substantiating CBI Claims

Bona Fide (Bona Fide-20171010-14:35:14 EDT) > Chemical Identification Information

CHEMICAL IDENTIFICATION INFORMATION

**Chemical Type**  
Complete either item 1 (Class 1 or 2/Biotechnology Chemical Substance) or 2 (Polymer) as appropriate. Indicate which selection you intend to complete below.

☐ Class 1 or 2/Biotechnology Chemical Substance ☐ Polymer

**Chemical Alias:**  
The chemical alias is an optional field that changes the folder name in the navigation tree on the left-hand side of the screen.

Previous Next

Validate Save Preview Submit

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**Bona Fide**  
Primary Authorized Official  
Bona Fide-20170720-13:27:12 EDT

[General Document Information](#)  
[Primary Contact Information](#)  
[Technical Contact Information](#)  
[Statement of Intent](#)  
**Letter of Support**  
[Letter of Support Submitter Information](#)  
[Letter of Support Submission Information](#)  
**Chemical**  
[Chemical Identification Information](#)  
**Chemical 101875**  
[Polymer Identification Information](#)  
[Monomers and Other Reactants](#)  
[Use Information](#)  
**Site Information**  
[Submitter Site Identification](#)  
[Document Management](#)  
[Optional Cover Letter](#)  
[Submitting Official Information](#)  
**CBI Substantiation**  
[Instructions for Substantiating CBI Claims](#)

**POLYMER IDENTIFICATION INFORMATION**

[Expand All](#) | [Collapse All](#)

Click the button below to add a substance to this document.

**Add Chemical ID**

CASRN:  
Chemical Name:  
Generic Name:

**ID Method**  
☐ Method 1 (CAS Inventory Expert Service) ☐ Method 2 (Other Method)

Chemical Structure Diagram (optional):  
Include an attachment for the chemical structure diagram below.

**Attach Chemical Structure**

| File Name | Description | Actions |
|-----------|-------------|---------|
|-----------|-------------|---------|

**Save**

Click the Add New Chemical button to add chemical name and structural information for a new chemical.

**Add New Chemical**

[Previous](#) [Next](#)

[Validate](#) [Save](#) [Preview](#) [Submit](#)

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HomeFormsUser ManagementResources

**Bona Fide**  
Primary Authorized Official  
Bona Fide-20171010-14:35:14 EDT

Technical Contact Information

Statement of Intent

Letter of Support

- Letter of Support Submitter Information
- Letter of Support Submission Information

Chemical

- Chemical Identification Information
- Chemical 102512**
  - Polymer Identification Information
  - Monomers and Other Reactants**
  - Use Information

Site Information

- Submitter Site Identification

Document Management

- Optional Cover Letter
- Submitting Official Information

CBI Substantiation

- Instructions for Substantiating CBI Claims

Bona Fide (Bona Fide-20171010-14:35:14 EDT) > Monomers and Other Reactants

**MONOMERS AND OTHER REACTANTS**

?

Select the Add Monomer button to add monomers that make up the polymer composition.

Expand All | Collapse All

Cancel

Click the button below to search EPA's Substance Registry Services (SRS) for the desired chemical.

Search SRS

CAS Registry Number:  
Monomer or other reactant:  
Include in Identity: ☐  
Typical Composition:  %

Save

Click to add a monomer 

Add Monomer

Composition Total:0%

Optional Attachments

Attach Document

| File Name | Description | Actions                                        |
|-----------|-------------|------------------------------------------------|
|           |             | <div>Previous</div> <div><div>Next</div></div> |

✓

Validate

Save

Preview

Submit

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EPA Form 7710-25

Exhibit 8-16 Use Information Screen (Bona Fide)

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Home

Forms

User Management

Resources

Bona Fide

Primary Authorized Official

Bona Fide-20171010-14:35:14 EDT

Technical Contact Information

Statement of Intent

Letter of Support

- Letter of Support Submitter Information
- Letter of Support Submission Information

Chemical

- Chemical Identification Information
- Chemical 102512
  - Polymer Identification Information
  - Monomers and Other Reactants
  - Use Information

Site Information

- Submitter Site Identification

Document Management

Optional Cover Letter

Submitting Official Information

CBI Substantiation

- Instructions for Substantiating CBI Claims

Bona Fide (Bona Fide-20171010-14:35:14 EDT) > Use Information

USE INFORMATION

How will the substance be used?

Previous

Next

Validate

Save

Preview

Submit

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Bona Fide

Primary Authorized Official

Bona Fide-20171010-14:35:14 EDT

Submitter Information

Letter of Support

Submission Information

Chemical

Chemical Identification Information

Chemical 102512

Polymer Identification Information

Monomers and Other Reactants

Use Information

Site Information

Submitter Site Identification

Document Management

Optional Cover Letter

Submitting Official Information

CBI Substantiation

Instructions for Substantiating CBI Claims

Bona Fide (Bona Fide-20171010-14:35:14 EDT) > Submitter Site Identification

?

SUBMITTER SITE IDENTIFICATION

Site of Manufacture or Port of Entry:  
Please identify a site for reporting or port of entry.

Add Site

List of Submitter Sites

| EPA Registry ID | Site of Manufacture or Port of Entry | Site Name | Address | Actions |
|-----------------|--------------------------------------|-----------|---------|---------|
|-----------------|--------------------------------------|-----------|---------|---------|

Previous

Next

Validate

Save

Preview

Submit

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Bona Fide  
Primary Authorized Official

Bona Fide-20171010-14:35:14  
EDT

Submitter Information

Letter of Support  
Submission Information

Chemical

Chemical Identification  
Information

Chemical 102512

Polymer  
Identification  
Information

Monomers and  
Other Reactants

Use Information

Site Information

Submitter Site  
Identification

Document Management

Optional Cover Letter

Submitting Official Information

CBI Substantiation

Instructions for  
Substantiating CBI Claims

Bona Fide (Bona Fide-20171010-14:35:14 EDT) > Document Management

DOCUMENT MANAGEMENT

?

Please attach at least one of each of the following documents:

- Spectrum of Substance:** Infrared spectrum or alternative spectra or other data which identify the substance.
- Statement of Commercialization:** 1) A brief statement indicating how long the substance has been in commercial use outside of the United States. 2) The name of a country in which it has been commercially used. 3) Whether the importer believes that the substance has already been used commercially, in any country, for the same purpose or application that the importer is intending.
- Statement of Research and Development:** A brief description of the research and development activities conducted to date related to the substance.

You can also attach other documents.

Attach Document

| Document Name           | Document Type | Action |
|-------------------------|---------------|--------|
| <div>PreviousNext</div> |               |        |

✓

Validate

📄

Save

🖥️

Preview

💾

Submit

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Bona Fide

Primary Authorized Official

Bona Fide-20171010-14:35:14 EDT

Submitter Information

Letter of Support

Submission Information

Chemical

Chemical Identification Information

Chemical 102512

Polymer Identification Information

Monomers and Other Reactants

Use Information

Site Information

Submitter Site Identification

Document Management

Optional Cover Letter

Submitting Official Information

CBI Substantiation

Instructions for Substantiating CBI Claims

Bona Fide (Bona Fide-20171010-14:35:14 EDT) > Optional Cover Letter

OPTIONAL COVER LETTER

If you would like to include a cover letter, please use the space below.

Previous

Next

Validate

Save

Preview

Submit

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# Submitting Official Information



Select the chemicals you want to notify the Secondary Submitter with:

- ☐ Chemical 1  
☐ Chemical 2

From: Jane.Doe@test.com

CC:

To:

Enter email addresses separated by semicolons (;) or commas (.). Click in this box to start entering email addresses.

Subject: 2015 Primary PMN

Message:

As the Authorized Official of TEST COMPANY, I have identified you as a Secondary Submitter of a letter of support submission for this 2015 Premanufacture Notice (PMN) form. Please use the Section 5 Notices and Supports application to provide the correct information for the necessary items in this form. See the instructions below for accessing the Section 5 Notices and Supports application. You will need to use the unique identification number to access and complete the Premanufacture Notice (PMN) form for the letter of support submission.  
Unique Identifier 0fe6d0cc-4e69-422b-b223-93a4154ae467

Information about the Section 5 programs, how to access the Section 5 Notices and Supports application, and instructions for reporting under the Section 5 rule are available at [www.epa.gov/oppt/newchems/](http://www.epa.gov/oppt/newchems/). For additional information or if you believe you have received this email in error, please contact me.

Additional Comments:

Send

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EPA Form 7710-25



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Premanufacture Notice  
Primary Authorized Official

Primary PMN-20170720-10:45:26  
EDT

Exposures/Releases

Byproduct Information

Remove

Add Operation

Optional Pollution Prevention

Additional Attachments

Attachment Summary

Optional Cover Letter

Joint Submission

Joint Submission 1

Joint Submitter Information

Joint Submission Information

Remove

Add Joint Submission

Letter of Support

Letter of Support 1

Letter of Support Submitter Information

Letter of Support Submission Information

Remove

Add Letter of Support

Submitting Official Information

SUBMITTING OFFICIAL INFORMATION

The information below has been pre-populated from CDX registration. If the information listed is incorrect please make the appropriate edits to your user information in CDX registration.

This confirmation is required to proceed with the submission process

Please confirm that you are the legally responsible party from the submitting company

☐

CBI:

☐

First Name:

Jane

Middle Initial:

Last Name:

Doe

Job Title:

Not Applicable

Company Name:

TEST

Phone Number:

Email Address:

Mailing Address 1:

TEST

Mailing Address 2:

City:

TEST

State:

VA

Postal Code:

22201

Country:

US

Previous

Submit

Upload XML

Validate

Save

Preview

Submit

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ACM  
Primary Authorized Official  
ACM-20170720-14:53:35 EDT

Contact Information

Attachments

Submitting Official Information

CBI Substantiation

Instructions for Substantiating CBI Claims

SUBMITTING OFFICIAL INFORMATION

The information below has been pre-populated from CDX registration. If the information listed is incorrect please make the appropriate edits to your user information in CDX registration.

**This confirmation is required to proceed with the submission process**  
Please confirm that you are the legally responsible party from the submitting company ☐

CBI:

☐

First Name:

Jane

Middle Initial:

Last Name:

Doe

Job Title:

Not Applicable

Company Name:

TEST

Phone Number:

Email Address:

Mailing Address 1:

TEST

Mailing Address 2:

City:

TEST

State:

VA

Postal Code:

22201

Country:

US

Previous

Next

 Validate

 Save

 Preview

 Submit

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# CBI Substantiation

Premanufacture Notice  
Primary Authorized Official

Primary PMN-20231218-09:54:49  
EST

Add Consolidated  
Chemical

Site Information

Sites Controlled By  
Others

Submitter Controlled  
Operations

Operation 1

Submitter  
Operation  
Information

Occupational  
Exposures

Environmental  
Releases

Remove

Add Operation

Operations Controlled by  
Others

Add Operation

Optional Pollution Prevention

Additional Attachments

Attachment Summary

Optional Cover Letter

Submitting Official Information

CBI Substantiation

CBI Claims and  
Substantiation

Premanufacture Notice (Primary PMN-20231218-09:54:49 EST) > CBI Claims and Substantiation

CBI CLAIMS AND SUBSTANTIATION

Click the Expand icon  to view and populate the substantiation answers for the CBI claims made. A green checkmark  indicates that substantiation answers have been provided and is complete. A substance that is missing an icon indicates an incomplete set of substantiation answers.

**Note:** Please do not copy/paste CBI Substantiations from external applications to prevent issues with form validation, and result in not being able to complete the submission or migration process. If you need to copy/paste from an external application, paste the substantiations into Notepad, then copy from Notepad into the reporting application.

Show 

150

 entries 

Search:

| <div></div> | Data Element                              | Chemical Identifier | Status | Action                                                                              |
|-------------|-------------------------------------------|---------------------|--------|-------------------------------------------------------------------------------------|
| <div></div> | Agent Information (PMN)                   |                     |        |                                                                                     |
| <div></div> | Technical Contact Information (PMN)       |                     |        |                                                                                     |
| <div></div> | Additional Submission Information (PMN)   |                     |        |                                                                                     |
|             | Prenotice Communication Number            | N/A                 |        |  |
|             | Previously Submitted Notice Number        | N/A                 |        |  |
|             | Bona Fide Intent Notice Number            | N/A                 |        |  |
| <div></div> | Class 1 Or 2 Chemical (PMN)               |                     |        |                                                                                     |
| <div></div> | Class 1 Or 2 Additional Chemical (PMN)    |                     |        |                                                                                     |
| <div></div> | Class 1 Or 2 Production Information (PMN) |                     |        |                                                                                     |

Showing 1 to 20 of 20 entries 

Previous 

1

 Next

Selected Chemical Identifier: N/A

Selected Chemical Claim: Prenotice Communication Number

A. 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.

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

☐ CBI

2980 characters remaining

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### LVE CERTIFICATION

I certify, under penalty of law, that the following is true:

- 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.
- The new chemical substance for which the notice is submitted meets all applicable exemption conditions.
- 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.

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LOREX CERTIFICATION

I certify, under penalty of law, that the following is true:

- 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.
- The new chemical substance for which the notice is submitted meets all applicable exemption conditions.

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Copy of Record, Validate,  
and Payment

EPA Form 7710-25

| EPA Support Form                                         |  |                                                                                  |  |           |                               |             |                             |  |                          |
|----------------------------------------------------------|--|----------------------------------------------------------------------------------|--|-----------|-------------------------------|-------------|-----------------------------|--|--------------------------|
| Support Form Report Number                               |  |                                                                                  |  |           |                               |             | Mark (X) if anything is CBI |  | <input type="checkbox"/> |
| I. ORIGINAL NOTICE SUBMISSION IDENTIFICATION             |  |                                                                                  |  |           |                               |             |                             |  |                          |
| Report Number                                            |  |                                                                                  |  | TS Number |                               | Case Number |                             |  |                          |
| Original Submission Date                                 |  |                                                                                  |  |           |                               |             |                             |  |                          |
| Original Submission Media Type                           |  |                                                                                  |  |           |                               |             |                             |  |                          |
| II. ORIGINAL NOTICE SUBMITTER IDENTIFICATION             |  |                                                                                  |  |           |                               |             |                             |  | <input type="checkbox"/> |
| Authorized Official Name                                 |  | (first)                                                                          |  |           | (last)                        |             |                             |  |                          |
| Position                                                 |  |                                                                                  |  |           | Company Name                  |             |                             |  |                          |
| Mailing Address (Number & Street)                        |  |                                                                                  |  |           |                               |             |                             |  |                          |
| City                                                     |  |                                                                                  |  | State     |                               | Postal Code |                             |  |                          |
| e-mail                                                   |  |                                                                                  |  |           | Telephone (include area code) |             |                             |  |                          |
| III. CURRENT SUPPORT DOCUMENT IDENTIFICATION INFORMATION |  |                                                                                  |  |           |                               |             |                             |  | <input type="checkbox"/> |
| Name                                                     |  | (first)                                                                          |  |           | (last)                        |             |                             |  |                          |
| Position                                                 |  |                                                                                  |  |           | Company Name                  |             |                             |  |                          |
| Mailing Address (Number & Street)                        |  |                                                                                  |  |           |                               |             |                             |  |                          |
| City                                                     |  |                                                                                  |  | State     |                               | Postal Code |                             |  |                          |
| Province                                                 |  |                                                                                  |  |           | Country                       |             |                             |  |                          |
| e-mail                                                   |  |                                                                                  |  |           | Telephone (include area code) |             |                             |  |                          |
| IV. TYPE OF SUPPORT (Check One)                          |  |                                                                                  |  |           |                               |             |                             |  |                          |
| <input type="checkbox"/>                                 |  | Transfer of Ownership                                                            |  |           |                               |             |                             |  |                          |
| <input type="checkbox"/>                                 |  | Suspension Request                                                               |  |           |                               |             |                             |  |                          |
| <input type="checkbox"/>                                 |  | Withdrawal Request                                                               |  |           |                               |             |                             |  |                          |
| <input type="checkbox"/>                                 |  | Other Correspondence                                                             |  |           |                               |             |                             |  |                          |
| <input type="checkbox"/>                                 |  | TEST DATA (Health/Eco/Fate)                                                      |  |           |                               |             |                             |  |                          |
| <input type="checkbox"/>                                 |  | Amendment (Changes made to PMN pages 1-13, MSDS or Physical/Chemical properties) |  |           |                               |             |                             |  |                          |
| Check if requested by EPA/ contractor                    |  |                                                                                  |  |           |                               |             |                             |  | <input type="checkbox"/> |
| EPA person/ contractor                                   |  |                                                                                  |  |           |                               |             |                             |  |                          |
| Submitter Signature                                      |  |                                                                                  |  |           |                               |             |                             |  |                          |

OMB Control No. 2070-0038  
Expiration 12/31/2025

[City is required.](#)  
[Country is required.](#)

- **LOS Submission 1**
  - **Letter of Support Submitter Information**
    - [First Name is required.](#)
    - [Last Name is required.](#)
    - [Company Name is required.](#)
    - [Phone Number is required.](#)
    - [Mailing Address 1 is required.](#)
    - [City is required.](#)
    - [Country is required.](#)
  - **Site Information**
    - ['Do you have sites controlled by the submitter?' is required.](#)
    - ['Do you have sites controlled by others?' is required.](#)
  - **Submitting Official Information**
    - [Legal Verification is required to proceed with the submission process.](#)
  - **CBI Substantiation**
    - [CBI Substantiation attachment is required.](#)

Warnings:

- **Joint Submission 1**
  - **Joint Submitter Information**
    - [Email Address is not required, but is suggested for this contact.](#)
  - **Joint Submission Information**
    - [You did not notify the Secondary Submitter of the joint submission.](#)
- **LOS Submission 1**
  - **Letter of Support Submitter Information**
    - [Email Address is not required, but is suggested for this contact.](#)
  - **Letter of Support Submission Information**
    - [You did not notify the Secondary Submitter of the letter of support submission.](#)



SECTION 5 NOTICES AND SUPPORTS VALIDATION

Errors:

- **General Form Information**
  - ❗ [A Type of Notice is required.](#)
- **Technical Contact Information**
  - ❗ [Contact is required.](#)
- **Additional Submission Information**
  - ❗ [Values are required.](#)
- **Chemicals**
  - ❗ At least one chemical must be provided.
- **Joint Submission 1**
  - **Joint Submitter Information**
    - ❗ [First Name is required.](#)
    - ❗ [Last Name is required.](#)
    - ❗ [Company Name is required.](#)
    - ❗ [Phone Number is required.](#)
    - ❗ [Mailing Address 1 is required.](#)
    - ❗ [City is required.](#)
    - ❗ [Country is required.](#)
- **LOS Submission 1**
  - **Letter of Support Submitter Information**
    - ❗ [First Name is required.](#)
    - ❗ [Last Name is required.](#)
    - ❗ [Company Name is required.](#)
    - ❗ [Phone Number is required.](#)



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[Log Out](#)

SUBMISSION PROCESS: VALIDATION?

  
Validation  


  
Make Payment  


  
PDF Generation  


  
CROMERR  


  
Submit  


Running validation on your data  
  
Processing. Please wait...  
(Please disable any pop-up blockers within your internet browser settings to allow for the validation pop-up to be displayed if validation errors are present.)

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Exhibit 14-5 Make a Payment Screen



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MAKE A PAYMENT

  
Validation

  
Make Payment

  
PDF Generation

  
CROMERR

  
Submit

If this is pending a joint and/or LOS submission(s), please enter an amount greater than 0 and less than or equal to the total payment amount. If you are not paying all or a portion of the amount due, check the 'Proceed without paying' checkbox to continue without paying. An email will be sent to notify the identified secondary submitter(s) if there is a remaining balance.

Total Due: \$16000.00  
Payment Amount:

☐ Proceed without paying.

Make a Payment

Cancel

Continue

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## CSPP PAYMENT PROCESSOR



### Payment Method

☒ Credit/Debit Card

☐ ACH Payment

### Payer Information

Payment Amount

\$8000.00

Card Number \*

Expiration Date \*

01 / 2018

Security Code \*

Account Holder Name \*

First Name

Last Name

☐ Use a company name

Billing Address \*

Address 1\*

Address 2

City/State/Zip Code \*

City

AK

Zip

Submit Payment

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Expiration 12/31/2025

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## CSPP PAYMENT PROCESSOR



### Payment Method

☐ Credit/Debit Card

☒ ACH Payment

### Bank Account Transaction

Payment Amount

\$8000.00

Account Type \*

Business Checking ▼

Check Number

Account Holder Name \*

First Name

Last Name

☐ Use a company name

Routing Number \*

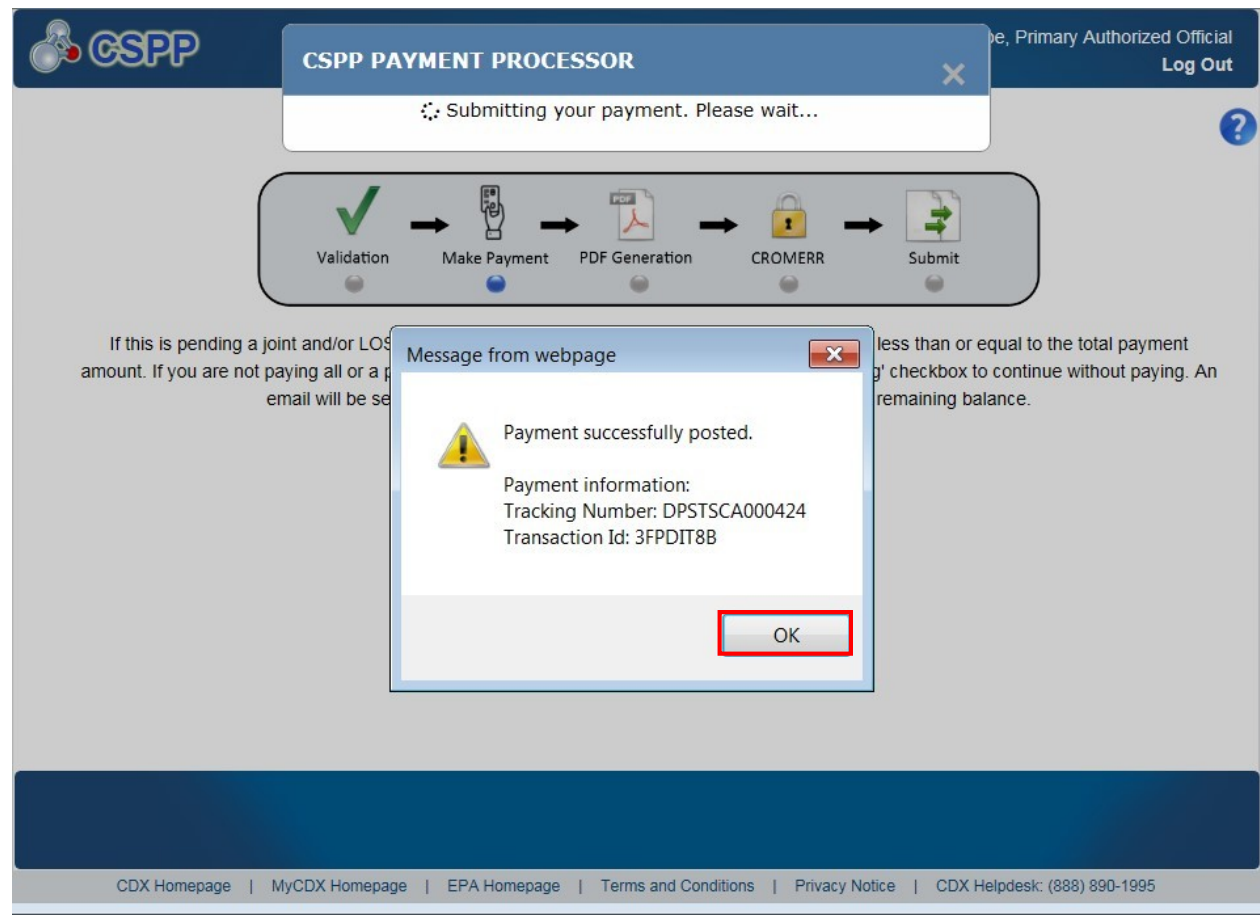
Account Number \*

Confirm Account Number \*

Submit Payment

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Exhibit 14-8 Successful Payment



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SUBMISSION PROCESS: PDF GENERATION

?

Your PDF preview transaction was successfull



[View PDF](#) [Continue](#)

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CROSS-MEDIA ELECTRONIC REPORTING REGULATION (CROMERR) LOGIN

✓

Validation

→

💳

Make Payment

→

📄

PDF Generation

→

🔒

CROMERR

→

📤

Submit

Please login with your CDX password:

Cancel

Next

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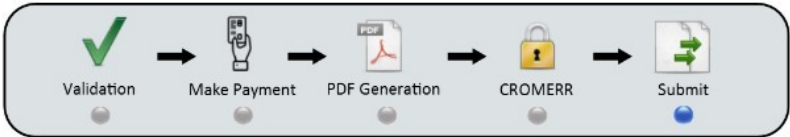
Exhibit 14-17 Submit to CDX Screen



Logged in as: Jane Doe, Primary Authorized Official

Log Out

SUBMIT TO CDX



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.

Cancel

Confirm



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CROSS-MEDIA ELECTRONIC REPORTING REGULATION (CROMERR) CERTIFICATION

?

  
Validation

  
Make Payment

  
PDF Generation

  
CROMERR

  
Submit

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.

Cancel

I Certify

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CROSS-MEDIA ELECTRONIC REPORTING REGULATION (CROMERR) SUBMISSION

?



Validation



Make Payment



PDF Generation



CROMERR



Submit

The submission was sent to the EPA. The Copy of Record link to allow for download of the Copy of Record and signature for this submission will appear in the Forms list when the EPA receives and processes your submission.

Finish

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Exhibit 15-1 Download Copy of Record Screen



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DOWNLOAD COPY OF RECORD

?

OMB Control No. 2070-0038  
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You can now download the Copy of Record for the ePMN submission



Download Copy of Record:

| File Name      | Action                                                                              |
|----------------|-------------------------------------------------------------------------------------|
| Copy of Record |  |

Download Communication Documents:

| Communication Type | File Name | File Size | Status | Download |
|--------------------|-----------|-----------|--------|----------|
|--------------------|-----------|-----------|--------|----------|

Fee Payment:

| Payment Amount | Payment Date | Status | Transaction ID | Tracking Number |
|----------------|--------------|--------|----------------|-----------------|
| \$16,000.00    | 2018-09-17   | Paid   | 3FPDKCB2       | DPSTSCA000465   |

Invoice Payment Documents:

| Payment Communication Type | File Name                                                | File Status                                                                          | Download                                                                             | Payment Amount | Due Date   | Payment Status | Payment Received Date            | Make a Payment                  |
|----------------------------|----------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|----------------|------------|----------------|----------------------------------|---------------------------------|
| Fee Payment                | CdxCommunication91917e1d-bf15-4212-b2b5-8237354d1a85.pdf |  |  | \$10,000.00    | 2018-12-21 | Unpaid         | No Payment Information Available | <div>Pay Your Invoice Now</div> |

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### SECTION 5 NOTICES AND SUPPORTS FORMS

- If submitting a form for the first time in the Section 5 Notices and Supports application, select the form type from the drop-down menu and click **Start New Form**.
- Only one Polymer Exemption submission per year should be filed per organization.
- To edit an In Progress form, click the form alias link in the **Alias** column in the table below.
- To access and edit a form previously submitted through CDX, unlock the form by clicking the lock (🔒) icon and enter the passphrase when prompted. All additional changes made to the form will be submitted as an amendment.
- To download a copy of record for a submitted form, click the green arrow (📄) icon and enter the passphrase when prompted.
- You may delete any form that has not yet been submitted by clicking the delete (✖) icon.
- All columns may be sorted by clicking the column header.

3 items found. Page 1 of 1 Items Per Page: 25

| Alias                                               | Type              | Subtype            | Case Number | Status      | Modify Date | Submission Date | Action |
|-----------------------------------------------------|-------------------|--------------------|-------------|-------------|-------------|-----------------|--------|
| <a href="#">Primary PMN-20170712-16:25:43 EDT</a>   | Primary PMN       | PMN                |             | In Progress | 07/12/2017  |                 | ✖      |
| <a href="#">Primary PMN-20170802-12:01:13 EDT</a>   | Primary PMN       | LOREX_MODIFICATION |             | Submitted   | 10/02/2017  | 10/02/2017      | 📄 🔒    |
| <a href="#">Polymer Exemption-20160707-15:20:37</a> | Polymer Exemption |                    | Y-16-0020   | Submitted   | 08/27/2016  | 08/27/2016      | 📄 🔒    |

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**Exhibit 16-4 Enter Passphrase Screen**

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**Log Out**



**ENTER PASSPHRASE**  
Please enter your form passphrase and click **Next**

**Forgot Your Passphrase?**  
For security reasons, the system administrator does not have access to your passphrase and cannot retrieve it or reset it to a new one. If you have forgotten your passphrase, you must complete a new Section 5 Notices and Supports Form and create a new passphrase for the chemical substances you intend to import or manufacture.

Cancel

Next

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Please login with your CDXweb password:

[Cancel](#) [OK](#)

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### SECTION 5 NOTICES AND SUPPORTS FORMS

- If submitting a form for the first time in the Section 5 Notices and Supports application, select the form type from the drop-down menu and click **Start New Form**.
- Only one Polymer Exemption submission per year should be filed per organization.
- To edit an In Progress form, click the form alias link in the Alias column in the table below.
- To access and edit a form previously submitted through CDX, unlock the form by clicking the lock (🔒) icon and enter the passphrase when prompted. All additional changes made to the form will be submitted as an amendment.
- To download a copy of record for a submitted form, click the green arrow (📄) icon and enter the passphrase when prompted.
- You may delete any form that has not yet been submitted by clicking the delete (✖) icon.
- All columns may be sorted by clicking the column header.

26 items found
Page 1 of 2
Items Per Page: 25

| Alias                             | Type              | Subtype | Case Number | Status      | Modify Date | Submission Date | Action |
|-----------------------------------|-------------------|---------|-------------|-------------|-------------|-----------------|--------|
| Primary PMN-20180907-13:44:14 EDT | Primary PMN       | PMN     | P-18-0342   | Submitted   | 09/07/2018  | 09/07/2018      | 📄 🔒    |
| Primary PMN-20180918-16:42:41 EDT | Primary PMN       | TMEA    |             | In Progress | 09/18/2018  |                 | ✖      |
| Primary PMN-20170712-16:25:43 EDT | Primary PMN       | PMN     |             | In Progress | 07/12/2017  |                 | ✖      |
| Primary PMN-20180423-14:22:10 EDT | Primary PMN       | PMN     | P-18-0183   | Submitted   | 05/16/2018  | 05/16/2018      | 📄 🔒    |
| Primary PMN-20180914-11:42:28 EDT | Primary PMN       | PMN     | P-18-0361   | In Progress | 09/17/2018  | 09/17/2018      | 📄 📄 🔒  |
| Polymer Exemption-                | Polymer Exemption |         |             | In Progress | 04/24/2018  |                 | ✖      |

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**Navigation:** After clicking the ‘Lock’ icon (🔒), a prompt will display to confirm the

## RESOURCES

### Section 5 Notices and Supports User Guide

This guide describes each screen of the Section 5 Notices and Supports software and provides information on how to use the system to complete a Section 5 Notices and Supports form. The guide also contains instructions for registering with CDX, submitting the Section 5 Notices and Supports form, and amending a previous submission. You can download and print the guide for quick reference.

[User Guide](#)

### Helpful Web Links

Click the link provided below to access additional information related to the Regulatory Impact Analysis for the Regulation of Microbial Products of Biotechnology: Government Costs.

[Regulatory Impact Analysis for the Regulation of Microbial Products of Biotechnology: Government Costs](#)

Click the link provided below to access additional information related to TSCA Biotechnology Regulations.

[Microbial Products of Biotechnology: Final Rule \(62 FR 17910\)](#)

Click the link provided below to access additional information related to Points to Consider in the Preparation of TSCA Biotechnology Submissions for Microorganisms.

[Points to Consider in the Preparation of TSCA Biotechnology Submissions for Microorganisms](#)

Click the link provided below to access additional information related to the Central Data Exchange (CDX).

[CDX Homepage](#)

Click the link provided below to access additional information related to the Toxic Substances Control Act (TSCA) Chemical Substances Inventory.

[TSCA Chemical Substances Inventory](#)

Click the link provided below to access additional information related to Substance Registry Services.

[Substance Registry Services \(SRS\)](#)

Click the link provided below to access additional information related to the Facility Registry System.

[Facility Registry System \(FRS\)](#)

Click the link provided below to access additional information related to Inventory Expert Services.

[CAS Inventory Expert Services](#)

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[Family Registry System \(FRS\)](#)

Click the link provided below to access additional information related to Inventory Expert Services.

[CAS Inventory Expert Services](#)

Click the link provided below to access additional information related to the National Pollutant Discharge Elimination System.

[National Pollutant Discharge Elimination System \(NPDES\)](#)

Click the link provided below to access additional information related to the New Chemicals Program.

[New Chemicals Program Homepage](#)

Click the link provided below to access information related to the status of Section 5 Notices.

[Status of Section 5 Notices](#)

Click the link provided below to access the instruction manual for reporting under the Toxic Substances Control Act §5 New Chemicals Program.

[Instruction Manual for Reporting Under the TSCA§5 New Chemicals Program](#)

Click the link provided below to access questions and answers for the New Chemicals Program under the Toxic Substances Control Act.

[Questions & Answers for the New Chemicals Program](#)

Click the link provided below to access information and guidance for new chemical submitters relating to new chemical notices, preparation of Pre-manufacture Notices, Significant New Use Notices, Exemption notices, EPA scientific approaches, and best practices.

[Points to Consider When Preparing TSCA New Chemical Notifications](#)

For technical assistance, please call CDX helpdesk at (888) 890-1995. For assistance on how to fill out the forms (content) or for policy questions, please call (202) 554-1404 Monday to Friday 8:30 a.m. - 5:00 p.m. EST or e-mail the TSCA Hotline at [TSCA-Hotline@epamail.epa.gov](mailto:TSCA-Hotline@epamail.epa.gov).

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