Header Sheet for Creating Extra PMN Submission Pages:

If your PMN needs extra pages, or is a consolidated PMN, fill out this page to instruct the electronic form on how many additional pages will be needed prior to entering your submission data. If this is not a consolidated form AND you do not require extra pages, you may skip this header page and proceed to the PMN form on the following page.

	For consolidated Section 5 submissions: (If not a consolidated submission skip to step 5 below.)												
1. Ente	1. Enter the prenotice communication number here												
2. Doe	2. Does this consolidated PMN form cover polymer or nonpolymer substances?												
	Polymer			Nonpol	ymer								
3. How	r many sul	bstances	were a	pproved	d for con	solidatio	on?						
	2	3	4	5	6								
	on your ar r) and 6 a		bove, th	is softw	vare will g	generat	e requirec	l additio	nal copi	es of pag	es 4 (if i	nonpolyn	ner) or 5 (if
the corr EACH s	4. Do you need additional copies of other pages for the member substances in this consolidation? If so, please check the corresponding box for the required extra pages below: (The corresponding pages you check will be generated for EACH substance, although you may not need the extra page for each substance. If you need more than one extra page 8 and/or page 9 for member substances of your consolidation, you may request them under step 5 below.)												
	8	9			10		11	1	3				

For **any** Section 5 submission, consolidated or not:

5. For additional copies of pages 8 and 9 (to show different exposures resulting from manufacturing and processing), indicate the number of additional pages required here:

9

8

6. If you have entered information for a consolidated PMN (steps 1 - 4) and/or requested additional pages under step 5, click on the following button to generate (spawn) the additional pages.

The software will now spawn the required number of pages. This will take several minutes, and will not require additional input from you while it generates the pages.

Note: The PMN pages will be automatically numbered. This header page will not be included in the page count showing on the form itself.

		Form Approved. O.M.B. N	o. 2070-0012. Appr	oval Expires 10-31-96.
U.S. ENV	IRONMENTAL PROTECTION AGENCY	AGENC	Y USE ONLY	Y
		Date of receipt		
	PREMANUFACTURE			
₩EPA	NOTICE			
	FOR NEW CHEMICAL SUBSTANCES			
When completed	DOCUMENT CONTROL OFFICER OFFICE OF POLLUTION PREVENTION			
send this	AND TOXIC SUBSTANCES, 7407			
form to	U.S. E.P.A. 1200 Pennsylvania, NW			
	WASHINGTON, D.C. 20460			
Enter the total number of pages in the Premanufacture Notice		Document control number	EPA case number	
	GENERAL INSTRUCTIONS	TS -		
You must provide all int not have actual data.	formation requested in this form to the extent that it is known	to or reasonably ascertainable by you	I. Make reasonable es	stimates if you do

- Before you complete this form, you should read the "Instructions Manual for Premanufacture Notification" (the Instructions Manual is available from the Toxic Substances Control Act (TSCA) Information Service by calling 202-554-1404, or faxing 202-554-5603).
- If a user fee has been remitted for this notice (40 CFR 700.45), indicate in the boxes above the TS-user fee identification number you have generated. Remember, your user fee ID number must also appear on your corresponding fee remittance, which is sent to EPA, Washington Financial Management Center (3303), P.O. 360399M, Pittsburgh, PA 15251-6399, Attn. TSCA User fee.

Part I --- GENERAL INFORMATION

You must provide the currently correct Chemical Abstracts (CA) Name of the new chemical substance, even if you claim the identity as confidential. You may authorize another person to submit chemical identity information for you, but your submission will not be complete and the review will not begin until EPA receives this information. A letter in support of your submission should reference your TS user fee identification number. You must submit an original and two copies of this notice including all test data. If you claimed any information as confidential, a single sanitized copy must also be submitted.

Part II --- HUMAN EXPOSURE AND ENVIRONMENTAL RELEASE

If there are several manufacture, processing, or use operations to be described in Part II, sections A and B of this notice, reproduce the sections as needed.

Part III --- LIST OF ATTACHMENTS

Attach additional sheets if there is not enough space to answer a question fully. Label each continuation sheet with the corresponding section heading. In Part III, list these attachments, any test data or other data and any optional information included in the notice.

OPTIONAL INFORMATION

You may include any information that you want EPA to consider in evaluating the new substance. On page 11 of this form, space has been provided for you to describe pollution prevention and recycling information you may have regarding the new substance.

So-called "binding" boxes are included throughout this form for you to indicate your willingness to be bound to certain statements you make in this section, such as use, production volume, protective equipment . . . This option is intended to reduce delays that routinely accompany the development of consent orders or Significant New Use Rules. Except in the case of exemption applications (such as TMEA, LVE, LOREX) where certain information provided in such notification is binding on the submitter when the Agency approves the exemption application, checking a binding box in this notice <u>does not</u> by itself prohibit the submitter from later deviating from the information (except chemical identity) reported in the form.

CONFIDENTIALITY CLAIMS

You may claim any information in this notice as confidential. To assert a claim on the form, mark (X) the confidential box next to the information that you claim as confidential. To assert a claim in an attachment, circle or bracket the information you claim as confidential. If you claim information in the notices as confidential, you must also provide a sanitized version of the notice, (including attachments). For additional instructions on claiming information as confidential, read the Instructions Manual.

Mark (x) if any information in this notice is claimed as confidential.

TEST DATA AND OTHER DATA

You are required to submit all test data in your possession or control and to provide a description of all other data known to or reasonably ascertainable by you, if these data are related to the health and environmental effects on the manufacture, processing, distribution in commerce, use, or disposal of the new chemical substance. Standard literature citations may be submitted for data in the open scientific literature. <u>Complete test data (written in English)</u>, not summaries of data, must be submitted if they do not appear in the open literature. You should clearly identify whether test data is on the substance or on an analog. Also, the chemical composition of the tested material should be characterized. Following are examples of test data and other data. Data should be submitted according to the requirements of §720.50 of the Premanufacture Notification Rule (40 CFR Part 720).

Test Data (Check Below any included in this notice)

- Environmental fate data
 Yes
 Other data
 Yes
 Health effects data
 Yes
 Risk assessments
- Environmental effects data Yes Structure/activity relationships
- Physical/Chemical Properties*
 Yes
 Test data not in the possession
 or control of the submitter
- * A physical and chemical properties worksheet is located on the last page of this form.

(Check Only One)

TYPE OF NOTICE
TYPE OF NOTICE

INTERMEDIATE PMN (submitted in sequence with final product PMN)

SNUN (Significant New U	(se Notice)
-------------------------	-------------

PMN (Premanufacture Notice)

TMEA (Test Marketing Exemption Application)

LVE (Low Volume Exemption) @ 40 CFR 723.50(c)(1)

LOREX (Low Release/Low Exposure Exemption) @ 40 CFR 723.50(c)(2)

IS THIS A CONSOLIDATED PMN?	[
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LVE Modification

of chemicals or polymers

(Prenotice Communication # required, enter # on page 3)

2

Public reporting burden for this collection of information is estimated to average 110 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. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Director, Collection Strategies Division (2822), U.S. Environmental Protection Agency, 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460; and to the Office of Management and Budget, Paperwork Reduction Act (2070-0012), Washington, D.C. 20503.

CERTIFICATION -- A Printed copy of this signature page, with original signature, must be submitted

I certify that to the best of my knowledge and belief:

- 1. The company named in Part I, section A, subsection 1a of this notice form intends to manufacture or import for a commercial purpose, other than in small quantities solely for research and development, the substance identified in Part I, Section B.
- 2. All information provided in this notice is complete and truthful as of the date of submission.
- 3. I am submitting with this notice all test data in my possession or control and a description of all other data known to or reasonably ascertainable by me as required by §720.50 of the Premanufacture Notification Rule.

Additional Certification Statements:

If you are submitting a PMN, Intermediate PMN, Consolidated PMN, or SN statement that applies:	UN, check the following user fee cer	tification				
The Company named in Part I, Section A has remitted the fee of \$2500 specified in 40 CFR 700.45(b), or						
The Company named in Part I, Section A has remitted the fee of \$1000 for an Intermediate PMN (defined @ 40 CFR 700.43) in accordance with 40 CFR 700.45(b), or						
The Company named in Part I 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).						
If you are submitting a low volume exemption (LVE) application in accordance with 40 CFR 723.50(c)(1) or a Low release and low exposure exemption (LoRex) application in accordance with 40 CFR 723.50(c)(2), check the following certification statements:						
The manufacturer submitting this notice intends to manufacture or import the new chemical substance for commercial purposes, other than in small quantities solely for research and development, under the terms of 40 CFR 723.50.						
The manufacturer is familiar with the terms of this section and will comply with those terms; and						
The new chemical substance for which the notice is submitted meets all	The new chemical substance for which the notice is submitted meets all applicable exemption conditions.					
If this application is for an LVE in accordance with 40 CFR 723.50(c)(1), the manufacturer intends to commence manufacture of the exempted substance for commercial purposes within 1 year of the date of the expiration of the 30 day review period.						
The accuracy of the statements you make in this notice should reflect your best prediction of the anticipate described herein. Any knowing and willful misinterpretation is subject to criminal penalty pursuant to 18		Confidential				
Signature and title of Authorized Official (Original Signature Required)	Date					
Signature of agent - (if applicable)	Date					

Part I GENERAL INFORMATION										
Section	A SUBMI	TTER IDENTIFICATION								Confi-
		Mark () the "Con	nfidential" box n	ext to any su		you claim as con	fidential			dential
	on mitting ce (in U.S.)	Name of authorized official Position								
		Company			I					
	Mailing address (number and street)									
		City, State		Postal Code						
b. Ager appli	nt (if icable)	Name of authorized official			Pos	ition				
		Company								
		Mailing address (number and s	treet)							
		City, State		Postal Co	ode					
c. If yo	ou are submitt	ing this notice as part of a joint s	ubmission, mark	(X) this box	K				→ □	
Joint Sub appli	omitter (if icable)	Name of authorized official			Pos	ition				
		Company								
		Mailing address (number and s	treet)					City, State		
		Province, Country		Postal Cod	e		<u> </u>			
2. Tech Cont U.S.)	tact (in	Name of authorized official			Pos	ition				
0.5.))	Company								
		Mailing address (number and s	treet)							
		City, State		Postal Code	<u>.</u>	Telephone	Area Code	Number		
		renotice communication (PC) concern Number to the notice, enter the num		•		<u> </u>	Mark (X) if none		•	
subs EPA	stance covered A. If you previo	ubmitted an exemption application for by this notice, enter the exemption nu uusly submitted a PMN for this substat y EPA (i.e. withdrawn or incomplete).	mber assigned by nce enter the PMN				Mark (X) if none		•	
for t		ed a notice of Bona fide intent to man bstance covered by this notice, enter the 		•			Mark (X) if none		•	
6. Ty	. Type of Notice - Mark (X) 1. Manufacture Only 2. Import Binding Option Mark (X) Binding Option Mark (X) Binding Option									

	Part I GENERAL INFORMATION Continued								
	Section B CHEMICAL IDENTITY INFORMATION: You must provide a currently correct Chemical Abstracts (CA) name of the substance based on the ninth Collective Index (9CI) of CA nomenclature rules and conventions.								
		Mark (X) the "Confidential" box next to any item you claim as confidential Complete either item 1 (Class 1 or 2 substances) or 2 (Polymers) as appropriate. Complete all other items.							
		If another person will submit chemical identity information for you (for either Item 1 or 2), mark (X) the box at the right. Identify the name, company, and address of that person in a continuation sheet.	Confi- dential						
1.		s 1 or 2 chemical substances (for definitions of class 1 and class 2 substances, see the Instructions Manual)							
	a. b.	Class of substance - Mark (X) 1 Class 1 or 2 Class 2 Chemical name (Currently correct Chemical Abstracts (CA) Name that is consistent with TSCA Inventory listings for similar substances. For Example 1							
		Class 1 substances a CA Index Name must be provided. For Class 2 substances either a CA Index Name or CA Preferred Name must be provided, which ever is appropriate based on CA 9CI nomenclature rules and conventions).							
	c.	Please identify which method you used to develop or obtain the specified chemical identity information reported in this notice: (check one). Method 1 (CAS Inventory Expert Service - a copy of the Identification Method 2 (Other Source) report obtained from the CAS Inventory Expert Services must be submitted as an attachment to this notice)							
	d.	Molecular formula CAS Registry Number (if a number already							
		exists for the substance)							
	e.	For a class 1 substance, provide a complete and correct chemical structure diagram. For a class 2 substance, provide a correct representative or partial chemical structure diagram, as complete as can be known, if one can be reasonably ascertained. Please see the E-PMN Instruction Manual for							
		discussion of "native format" diagram software which can be helpful in reviewing your substance.							
	Μ	Iark (X) this box if you attach a continuation sheet.							

For a class 2 substance - (1) List the immediate precursor substances with their respective CAS Registry Numbers. (2) Describe the nature of the reaction (3) Indicate the range of composition and the typical composition (where appropriate).	or process.
e. (1) List the immediate precursor substances with their respective CAS Registry Numbers. Name (CAS #)	Confi-
	dential
e. (2) Describe the nature of the reaction or process.	
e. (3) Indicate the range of composition and the typical composition (where appropriate).	
e. (3) indicate the range of composition and the typical composition (where appropriate).	
Mark (X) this box if you attach a continuation sheet.	

Part I GENERAL INFORMATION Continued											
	3 CHEMICAL IDENTITY INFORMATION Continued										
2. Polyr	ners (For a definition of polymer, see the Instructions Manual.)						Confi- dential				
	a. Indicate the number-average weight of the lowest molecular weight composition of the polymer you intend to manufacture. Indicate maximum weight percent of low molecular weight species (not including residual monomers, reactants, or solvents) below 500 and below 1,000 absolute molecular weight of that composition.										
Describe the methods of measurement or the basis for your estimates: GPC Other : (Specify below)											
	(i) lowest number average molecular weight:										
	(ii) maximum weight % below 500 molecular weight:		_								
	(iii) maximum weight % below 1000 molecular weight:		_								
	Mark (X) this box if you attach a continuation sheet.										
	 description on the TSCA Chemical Substance Inventory. (5) - Mark (X) this column if entries in columns (3) and (4) are confidential. (6) - Indicate the maximum weight percent of each monomer or other reactant that may be present as a residual in the polymer as manufactured for commercial purposes. (7) - Mark (X) this column if entry in column (6) is confidential. 										
	Monomer or other reactant and CAS Registry Number	Confi- dential	Typical composition	Include in identity	Confi- dential	Maximum residual	Confi- dential				
	(1)	(2)	(3)	(4)	(5)	(6)	(7)				
			%			%					
			%			%					
			%			%					
			%			%					
			%			%					
			%			%					
			%			%					
			%			%					
			%			%					
			%			%					
			%			%					
			%			%					
			%			%					
м	ark (X) this box if you attach a continuation sheet			•							

c. Please identify which method you used to develop or obtain the specified chemical identity information reported in this notice (check one). Method 1 (CAS Inventory Expert Service - a copy of the identification report Method 2 (other source)	CBI
obtained from CAS Inventory Expert Service must be submitted as an attachment to this notice)	
d. The currently correct Chemical Abstracts (CA) name for the polymer that is consistent with TSCA Inventory listings for similar polymers.	
CAS Registry Number (if a number already exists for the substance)	
CAS Registry Number (if a number already exists for the substance)	
e. Provide a correct representative or partial chemical structure diagram, as complete as can be known, if one can be reasonably ascertained. Plea	ase
see the E-PMN Instruction Manual for discussion of "native format" diagram software which can be helpful in reviewing your substance.	
Mark (X) this box if you attach a continuation sheet.	

Part I GENERAL INFORMATION Conti	nued						
Section B CHEMICAL IDENTITY INFORMATION Continued							
 3. Impurities (a) - Identify each impurity that may be reasonably anticipated to be present in the chemical substance as 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 		Provide					
Impurity and CAS Registry Number	Maximum	Confi-					
(a)	percent (b)	dential					
	%						
	%						
	%						
	%						
	%						
	%						
	%						
Mark (X) this box if you attach a continuation sheet.		Confi-					
4. Synonyms - Enter any chemical synonyms for the new chemical identified in subsection 1 or 2.							
Mark (X) this box if you attach a continuation sheet.							
5. Trade identification - List trade names for the new chemical substance identified in subsection 1 or 2.							
Mark (X) this box if you attach a continuation sheet.							
6. Generic chemical name - If you claim chemical identify as confidential, you must provide a generic name for your substance that reveals the specific chemical identity of the new chemical substance to the maximum extent possible. Refer to the TSCA Chemical Substance Inventory, 1985 Edition, Appendix B for guidance on developing generic names.							
Mark (X) this box if you attach a continuation sheet.	1 1 1 1 . D 1 4 010						
7. Byproducts - Describe any byproducts resulting from the manufacture, processing, use, or disposal of the new Number if available.							
Byproduct (1)	CAS Registry Number (2)	Confi- dential					
Mark (X) this box if you attach a continuation sheet.							

Part I GE					[ON	Con	tinued	1				
Section C PRODUCTION, IMPORT, AND							~ 1					
Mark (X) the "Confiden											•	
 Production volume Estimate the maximum proproduction volume for any consecutive 12-month production basis. For a Low Volume Exemption ap 10,000 kg/yr, specify the volume and mark (x) in the volume and mark (x) in the volume and mark (x). 	period du plication	ring the	first thre choose t	ee years o have y	s of prod your not	uction. ice revi	Estimate ewed at	tes shou a lower	ld be on	100% n	new che	
Maximum first 12-month production (kg/yr)		ig oox.			2-mont					С	onfi-	Binding
(100% new chemical substance basis)					chemi						ential	Option Mark (x)
 Use Information You must make separate confidential category, the formulation of the new substance, and other a. (1)Describe each intended category of use of the r confidential business information (CBI). (3)Indicate your wiproduction for the first three years devoted to each category of Estimate the percent of the new substance as formulated in mix your control associated with each category of use. (7)Mark (product volume expected for the listed "use" sectors. Mark mobinding. (9)Mark (X) this column if entry(ies) in column (8) 	r use infor new chem Illingness use. (5) - tures, susp X) this co re than or	rmation. ical subst to have th -Mark (X pensions, olumn if e ne box if a	Mark (X) ance by f ne inform) this colu- emulsion ntry in co uppropria	the "Co function a ation pro umn if er us, solution fumn (6) te. Mark	nfidential and applic ovided in ntry in col ons, or ge) is confid c (X) to in	l" Box n cation. (column (lumn (4) ls as mai lential bu dicate y	ext to any (2)Mar (1) bindir is confid nufacture usiness ir	y item yo k (X) this ng. (4) lential bu ed for con nformatic	u claim a s column Estimate usiness int mmercial on (CBI).	s confide if entry c the perce formation purposes (8)Ind	ential. column (ent of tot n (CBI). at sites licate %	1) is tal (6) under of
Category of use (1) (by function and application i.e. a dispersive dye for finishing polyester fibers)	CBI	Binding Option Mark	Prod- uction	CBI	% in Formu	CBI	%	of subst	ance expe (8)	ected per	use	CBI
	(2)	(x) (3)	% (4)	(5)	lation (6)	(7)	Site-	Cons-	Indus-	Com-	Binding	(9)
	(2)	(-)	(4)	(3)	(0)	()	limited	umer	trial	mercial	Option	
			%		%							
			%		%							
			%		%							
			70		70							
			%		%							
			%		%							
			%		%							
			%		%							
 * If you have identified a "consumer" use, please provide on In addition include estimates of the concentration of the ne substance loses its identity in the consumer product. Mark (X) this box if you attach a continuation sheet. 	w chemic	al substar	ice as exp	bected in	consume	r produc	ts and de	scribe th	e chemica	al reaction	ns by wi	hich this
b. Generic use If you claim any category of use des description Manual for examples of generic u			on 2a as o	confiden	tial, enter	a generi	ic descrip	otion of th	hat catego	ory. Read	the Ins	ruction
Mark (X) this box if you attach a continuation sheet												
3. Hazard Information Include in the notice a copy of reasinformation which will be provided to any person who is retter the safe handing, transport, use, or disposal of the new substitution of the new substitution.	easonably	likely to	be expose	ed to this	s substanc	e regard	ing prote					Binding Option Mark (x)
Mark (X) this box if you attach hazard information.												

	I HUMAN EXPOSURE			
Section A INDUSTRIAL S	SITES CONTROLLED BY TI		Mark (X) the "Confidential" box next to a claim as confidential	ny item you
		e operation involving the new c	hemical substance at industrial sites y	
			ou may still have reporting requireme	ents if
1. Operation description	essing or use operations after import.	You must describe these oper	ations. See instructions manual	Confi-
	ntity of the site at which the operatio	on will occur.		dential
Name				
Site address (number and street)				
City, County, State, ZIP code				
If the same operation will occu	ar at more than one site, enter the nu	mber of sites. Identify the		
additional sites on a continuation	on sheet, and if any of the sites have	e significantly different		
production rates or operations, sites as attachments.	include all the information requested	ed in this section for those		
	attach a continuation shoot			
b. Type	attach a continuation sheet.			
Mark (X)	Manufacturing	Processing	Use	
c. Amount and Durati	ion Complete 1 or 2 as appropriate			
	Maximum kg/batch (100% new chemical substance)	Hours/batch	Batches/year	
1. Batch	substance)			
	Maximum kg/day (100% new chemical	Hours/day	Days/year	
2. Continuous	substance)			
	x (X) to indicate your willingness to have ration steps and chemical conversions.		rt containers (specify- e.g. 5 gallon pails, 5	5 gallon
drum, rail car, tank truck, et	tc.).			-
			ce basis), and entry point of all starting ma es. Include cleaning chemicals (note frequ	
used daily or per batch.).		-		-
	nts of release, including small or intermit econd release number for the second med		f the new chemical substance. If releasing	to two media
ut the sume step, ussign a se	cond release number for the second med	ituiti.		
Mark (X) this box if you attach a	a continuation sheet			

Part II-- HUMAN EXPOSURE AND ENVIRONMENTAL RELEASE -- Continued

Section A -- INDUSTRIAL SITES CONTROLLED BY THE SUBMITTER -- Continued

2. Occupational Exposure -- You must make separate confidentiality claims for the description of worker activity, physical form of the new chemical substance, number of works exposed, and duration of activity. Mark (X) the "Confidential" box next to any item you claim as confidential.

(1) -- Describe the activities (i.e. bag dumping, tote filling, unloading drums, sampling, cleaning, etc.) in which workers may be exposed to the substance.

(2) -- Mark (X) this column if entry in column (1) is confidential business information (CBI).

(3) -- Describe any protective equipment and engineering controls used to protect workers.

(4) and (6) -- Indicate your willingness to have the information provided in column (3) or (5) binding.

(5) -- Indicate the physical form(s) of the new chemical substance (e.g., solid: crystal, granule, powder, or dust) and % new chemical substance (if part of a mixture) at the time of exposure.

-- Mark (X) this column if entry in column (5) is confidential business information (CBI). (7)

(8) -- Estimate the maximum number of workers involved in each activity for all sites combined.

(9) -- Mark (X) this column if entry in column (8) is confidential business information (CBI).

(10) and (11) -- Estimate the maximum duration of the activity for any worker in hours per day and days per year.
 (12) -- Mark (X) this column if entries in columns (10) and (11) are confidential business information (CBI).

forms(s)	(12) Mark (X) this column is	entries i	n columns (10) and (11) are confidential b	usiness in	formation (Cl	BI).	~	L				
e. bag dumping, filling drums) Engineering Controls Option and % new Option Workers Hrs/day Days/yr	Worker activity	CBI	Protective Equipment/	Binding	Physical forms(s)		CBI	# of	CBI	Maximum	duration	CB
(1) (2) (3) (4) (3) (6) (7) (8) (9) (10) (11) (12) (1) (2) (3) (4) (5) (4) (7) <t< td=""><td>(i.e., bag dumping, filling drums)</td><td>1</td><td>Engineering Controls</td><td>Option Mark (x)</td><td>and % new</td><td>Option Mark (x)</td><td></td><td>Workers</td><td></td><td>Hrs/day</td><td>Days/yr</td><td>1</td></t<>	(i.e., bag dumping, filling drums)	1	Engineering Controls	Option Mark (x)	and % new	Option Mark (x)		Workers		Hrs/day	Days/yr	1
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	Exposed (8)	(9)	(10)	(11)	(12
	(1)							(0)				
Mark (X) this box if you attach a continuation sheet.	Mark (X) this box if you att	ach a con	tinuation sheet.									

EPA FORM 7710-25 (Rev. 5-95)

- 3. Environmental Release and Disposal -- You must make separate confidentiality claims for the release number and the amount of the new chemical substance released and other release and disposal information. Mark (X) the "Confidential" box next to each item you claim as confidential.
 - (1) -- Enter the number of each release point identified in the process description, part II, section A, subsection 1d(3).
 - (2) -- Estimate the amount of the new substance released (a) directly to the environment or (b) into control technology (in kg/day or kg/batch).
 - (3) -- Mark (X) this column if entries in columns (1) and (2) are confidential business information (CBI).
 - (4) -- Identify the media (stack air, fugitive air (optional-see Instruction Manual), surface water, on-site or off-site land or incineration, POTW, or other (specify)) to which the new substance will be released from that release point.
 - (5) -- a. Describe control technology, if any, and control efficiency that will be used to limit the release of the new substance to the environment. For releases disposed of on land, characterize the disposal method and state whether it is approved for disposal of RCRA hazardous waste. On a continuation sheet, for each site describe any additional disposal methods that will be used and whether the waste is subject to secondary or tertiary on-site treatment. b. Estimate the amount released to the environment after control technology (in kg/day).
 - (6) -- Mark (X) this column if entries in columns (4) and (5) are confidential business information (CBI).
 - (7) -- Identify the destination(s) of releases to water. Please supply NPDES (National Pollutant Discharge Elimination System) numbers for direct discharges or NPDES numbers of the POTW (Publicly Owned Treatment Works). Mark (X) if the POTW name or NPDES # is confidential business information (CBI).

Number (1)substance released (2a)release (2b)efficiency data)efficiency data)(3)(3)(3)(3)(5)(5)(4)(3)(3)(3)(5)(5)(5)(3)(3)(3)(4)(5)(1)(2a)(2b)(3)(3)(5)(2a)(2b)(3)(3)(4)(5)(5a)(5a)(5a)(5b)(1)(1)(1)(1)(2a)(2b)(3)(1)(1)(1)(1)(1)(1)(1)(1)(1)(2a)(2b)(3)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(2a)(2b)(2b)(1)(1)(1)(1)(1)(1)(1)(1)(1)(2a)(2b)(2b)(1)(2a)(2b)(1)(1)(2a)(2b)(1)(1)(1)(1)(1)(1)(2a)(2b)(1)(1)(2a)(2b)(1)(1)(2a)(2b)(1)(1)(2a)(2b)(1)(1)(2a)(2b)	(6)
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	
	1
(7) Mark (X) the destination(s) of releases to water. NPDES #	CBI
(7) Mark (X) the destination(s) of releases to water. NPDES # POTWprovide	
name(s)	
Navigable waterway provide name(s)	
OtherSpecify	
Mark (X) this box if you attach a continuation sheet.	

Part II-- HUMAN EXPOSURE AND ENVIRONMENTAL RELEASE -- Continued

Section B -- INDUSTRIAL SITES CONTROLLED BY OTHERS

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

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

of sites

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

Mark (X) this box if you attach a continuation sheet.

((6) Des wor (7) Esti (9) Fron 10) Est 12) Des and	cribe placers. nate then the placers the cribe received a control	hysical for ne percent rocess dia he amour nedia of r l technolo yproducts	orm of exp of the ne agram abo nt of the n release i.e ogy, if any s which m	posure a ew subst ove, ente ew subs e. stack a y, that w hay result	and $\sqrt[6]{6}$ new che cance as formu er the number stance released air, fugitive ain vill be used to b lt from the ope	mical sul lated who of each r l (a) direc (optiona limit the eration.	ours per day and (b) days per year. bstance (if in mixture), and any protective equipment and engineering controls, if any, used en packaged or used as a final product. elease point. Complete 9-13 for each release point identified. ty to the environment or (b) into control technology to the environment (in kg/day or kg/ba l-see Instructions Manual), surface water, on-site or off-site land or incineration, POTW, or release of the new substance to the environment. X) this column if any of the proceeding entries are confidential business information (CBI).	itch).	cify)
Letter # of OF Workers CBI Duration Of CBI Exposure CBI Protective Equip. /Engineering Controls/Physical Form and/ % new substance							% in Form- ulation	CBI		
(1)	(2)	(3)	(4a)	(4b)	(5)			(6)	(7)	(8)
	Release Amount of Number New Substance Released				CBI	Media of Release & Control Technology		CBI		
(9))		(10a)			(10b)	(11)	(12)		(13)
(14) -	- Byprodu	cts:		•			-			(15)
	Mar	k (X) t	his box if	you attac	ch a con	tinuation shee	t,			1

(1) -- From the diagram above, provide the letter for each worker activity. Complete 2-8 for each worker activity described.

OPTIONAL POLLUTION PREVENTION INFORMATION

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

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

Worker Exposure/Environmental Release

(2) -- Estimate the number of workers exposed for all sites combined.

Optional Pollution Prevention Information (Continued) Describe the expected net benefits, such as (1) an overall reduction in risk to human health or the environment; (2) a reduction in the volume manufactured; (3) a reduction in the generation of waste materials through recycling, source reduction or other means; (4) a reduction in potential toxicity or human exposure and/or environmental release; (5) an increase in product performance, a decrease in the cost of production and/or improved operation efficiency of the new chemical substance in comparison to existing chemical substances used in similar application; or (6) the extent to which the new chemical substance may be a substitute for an existing substance that poses a greater overall risk to human health or the environment.

CBI

Mark (X) this box if you attach a continuation sheet.

Part III -- LIST OF ATTACHMENTS

Attach continuation sheets for sections of the form and test data and other data (including physical/chemical properties and structure/activity information), and optional information after this page. Clearly identify the attachment and the section of the form to which it relates, if appropriate. Number consecutively the pages of any paper attachments. In the column below, enter the inclusive page numbers of each attachment. Electronic attachments can be identified by filename.

Mark (X) the "Confidential" box next to any attachment name you claim as confidential. Read the Instructions Manual for guidance on how to claim any information in an attachment as confidential. You must include with the sanitized copy of the notice form a sanitized version of any attachment in which you claim information as confidential.

#	Attachment name	Attachment Filename	Attachment page number(s)	Confi- dential
			1.8	
	Mark (X) this box if you attach a continuation sheet. Enter the attachment name and number	er.	•	

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 page of the notice on which the property appears, 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. If the attachments are electronic, give the attachment number (found on page 12) at (b). The physical state of the neat substance should be provided. These measured properties should be for the neat (100% pure) chemical substance. Properties that are measured for mixtures or formulations should be so noted (% PMN substance in). You are not required to submit this worksheet; however, EPA strongly recommends that you do so, as it will simplify review and ensure that confidential information is properly protected. You should submit this worksheet as a supplement to your submission of test data. This worksheet is not a substitute for submission of test data.											
Property	Mark (X)	Page	Value	Measured on	Confi- dential						
(a)	if provided	number (b)	(c)	Estimate (M or E)	Mark (X) (d)						
Physical state of neat substance			(s)(l)(g)								
Vapor pressure @ Temperature°C			Torr								
Density/relative density			g/cm3								
Solubility @ Temperature°C											
Solvent			g/L								
Solubility in water @ Temperature°C			g/L								
Melting temperature			°C								
Boiling / sublimation temperature@torr pressure			°C								
Spectra											
Dissociation constant											
Particle size distribution											
Octanol / water partition coefficient											
Henry's Law constant											
Volatilization from water											
Volatilization from soil											
pH@ concentration											
Flammability											
Explodability											
Adsorption / coefficient											
Other - Specify											