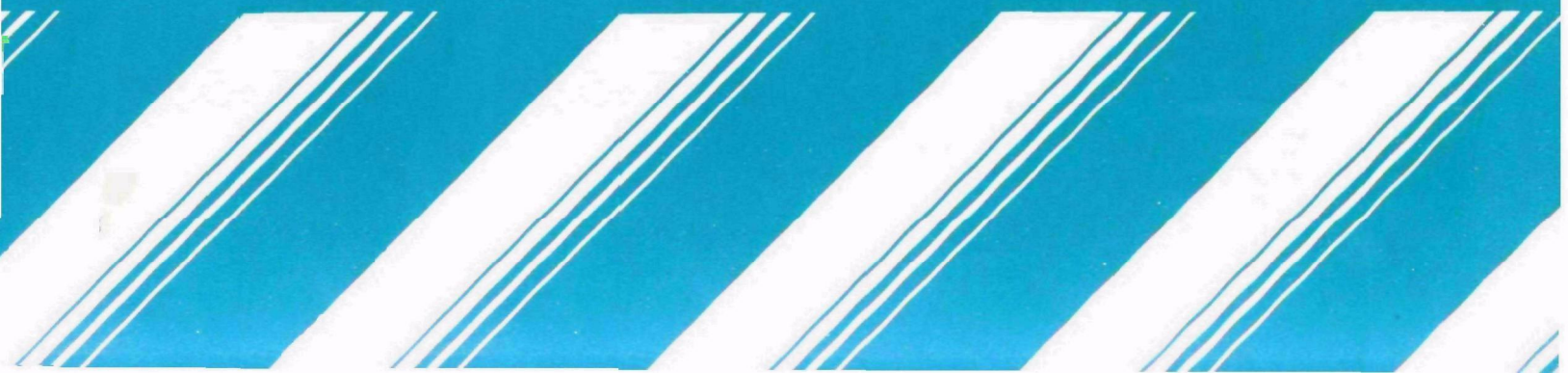




Instructions For Reporting For The 1994 Partial Updating Of The TSCA Chemical Inventory Data Base



**Instructions for Reporting
for the 1994 Partial Updating of the
TSCA Chemical Inventory Data Base**

**U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
Washington, DC 20460**

HIGHLIGHTS OF THE 1994 IUR COLLECTION

- The reporting period is from August 25, 1994 to December 23, 1994.
- There are no substantive changes in the information required for the 1994 IUR reporting as compared to the 1990 collection.
- Manufacturers of TSCA Inventory chemical substances manufactured solely for export, which are not otherwise exempt from reporting, have an obligation to comply with all IUR reporting requirements.
- An appendix to the instructions, Appendix A, lists chemical substances which: are subject to a rule, proposed or promulgated under TSCA sections 4, 5(a)(2), 5(b)(4), and 6; are subject to an order issued under section 5(e) and 5(f); or are the subject of relief that has been granted under a civil action under sections 5 or 7 of the Act. This list has been updated to include recent regulatory actions. All subjects on this list are subject to IUR reporting.
- A current version of the non-confidential TSCA Inventory has been prepared in diskette and computer tape formats. The printed and electronic versions of the Inventory are available from the National Technical Information Service. (1-800-553-NTIS)
- The revised 1994 IUR reporting forms (Form U) are readable by optical recognition scanners and each reporting form has a unique identifying report number. Use only original 1994 Form U's obtained from the Agency. You may not use photocopies.
- Companies may report to EPA using PC diskettes. **Computer tapes are not acceptable.** There is no minimum number of chemical substances required for electronic reporting. Information on any chemical with a confidential identity may be included on a diskette submission.
- Appendix B contains instructions for computer diskette submissions.
- Mailing addresses and telephone numbers for contacting the Agency have been updated.
- For questions concerning IUR reporting or to request additional forms, contact the TSCA Hotline, Monday through Friday, 8:30 am to 5:00 pm, East Coast time at (202) 554-1404.

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INSTRUCTIONS FOR REPORTING FOR THE PARTIAL UPDATING OF THE TSCA CHEMICAL INVENTORY DATA BASE

(INVENTORY UPDATE RULE)

I. INTRODUCTION

The Environmental Protection Agency (EPA) in 1986 promulgated a rule, often referred to as the Inventory Update Rule, for the partial updating of the TSCA Chemical Inventory data base. The rule requires manufacturers and importers of selected chemical substances included on the TSCA Chemical Substance Inventory to report current data on the production volume, plant site, and site-limited status of these substances. The rule was promulgated under the authority of section 8(a) of the Toxic Substances Control Act (TSCA), and is codified in Subpart B of Part 710 of Title 40 of the Code of Federal Regulations (40 CFR Part 710).

Reporting under the Inventory Update Rule takes place at four-year intervals which began in 1986. These instructions pertain to reporting during 1994.

This booklet provides detailed instructions and examples to assist manufacturers and importers in reporting under the Inventory Update Rule. **These instructions, however, are not a substitute for the rule.** Manufacturers and importers of chemical substances should carefully review the Inventory Update Rule to determine whether they are subject to its reporting requirements and what information is to be reported.

Persons reporting under the Inventory Update Rule should have a thorough understanding of the scope and organization of the TSCA Chemical Substance Inventory and of the criteria used to determine whether a substance belongs on the Inventory. Information on the scope and organization of the Inventory can be found in the introductory pages of the 1985 edition of the Inventory and in the 1990 Supplement to the Inventory. Subpart A of 40 CFR Part 710 prescribes criteria for inclusion of a substance on the Inventory.

See Section V (page 27) for instructions on how to obtain copies of the Inventory and of TSCA regulations.

II. DETERMINING THE SUBSTANCES FOR WHICH YOU MUST REPORT

To ascertain your reporting obligations, you must make two determinations for each chemical substance that you manufacture in the United States or import into the United States:

- 1) Is the substance reportable under the Inventory Update Rule?
- 2) Are you a manufacturer, importer, or exporter who is required to report that substance?

A. Reportable substances.

To be reportable under the Inventory Update Rule, a chemical substance must meet two requirements:

- 1) The substance must be on the TSCA Chemical Substance Inventory as of August 25, 1994; and
- 2) The substance must not be of a type exempt from reporting under the Inventory Update Rule.

1. Inventory substances. The TSCA Chemical Substance Inventory is a list of chemical substances distributed in commerce in the United States. The Inventory was originally compiled from reports submitted by manufacturers, importers and certain processors in 1978 and 1979. New chemical substances are added to the Inventory when companies who have submitted Premanufacture Notifications (PMNs) or Polymer Exemption Applications to EPA under section 5 of TSCA notify the Agency that manufacture or import of the chemical substance has commenced.

EPA keeps a Master Inventory File, which is the authoritative list of all the eligible chemical substances which have been reported to EPA for inclusion in the Inventory. EPA also makes available both in printed and computer-readable form a public version of the Inventory, referred to as the Public Inventory. The Public Inventory does not contain the specific identities of chemical substances whose identities have been claimed as confidential business information (CBI). The printed version of the Public Inventory does contain generic chemical names for these CBI chemical substances. However, the computer-readable version does not. The Public Inventory has been updated several times both in print and computer-readable form. The most complete edition of the printed version of the Public Inventory was published in 1985, and a 1990 supplement to the 1985 edition is also available. The computer-readable version of the Public Inventory is being updated biannually. Additionally, EPA will also be making available to the public a PC readable version before the commencement of the reporting period, as referenced in the Federal Register announcement for the

reporting period. See Section V of these instructions (page 27) for information on obtaining copies of the Public Inventory.

2. How to determine whether a chemical substance is listed on the Inventory. Many companies have already determined that the substances they manufacture or import are on the Inventory. You may have been able to make such a determination if:

- 1) you have located the substance in the Public Inventory;
- 2) you reported the substance to EPA under the Inventory reporting rule in 1978 or 1979 or as an Inventory correction;
- 3) in response to a PMN, Test Market Exemption Application, bona fide request, or other communication the Agency has informed you that the substance is on the Inventory; or
- 4) you have submitted a Notice of Commencement of manufacture or import for a PMN substance.

If you do not already know whether a substance you manufacture or import is on the Inventory, you should consult a copy of the latest public version of the Inventory (see Section V, below, for instructions on how to obtain a copy). The Public Inventory provides detailed information on the organization of the Inventory and on how substances are named and listed.

Several commercial databases have incorporated the public version of the Inventory (which does not include substances with confidential identities) and indicate whether a given chemical substance is included on the Inventory. EPA can guarantee neither the currency nor the accuracy of the information on these databases; however, there is no penalty for reporting a substance which is not required to be reported.

If at this point you know that your substance is on the Inventory, you may proceed to Section II.A.2. (page 3) to determine whether it is of a type exempt from reporting under the Inventory Update Rule.

If after having checked the above sources you are still uncertain as to whether a chemical substance is listed on the Inventory, you should write to EPA at the following address:

OPPT Document Control Officer
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (7407)
401 M Street, S.W.
Washington, DC 20460
ATTN: Inventory Update Rule/Bonafide

Your letter should request that EPA search the Master Inventory File, including confidential substances, to determine whether the substance is listed. You must substantiate the fact that you are actually manufacturing or importing the substance in question by providing the following information:

- 1) company identification, address, and telephone number;
- 2) the specific chemical identity of the substance, preferably a Chemical Abstracts Service Preferred or Index Name, a Chemical Abstracts Service Registry Number (if available), and a structural diagram (if available);
- 3) a statement signed by a company officer that your company is manufacturing and/or importing the chemical substance for commercial purposes;
- 4) a statement signed by a company officer that your company is requesting this search pursuant to the Inventory Update Rule; and
- 5) an elemental analysis of the substance.

You may claim information in your letter as confidential by circling or bracketing the text to be protected and marking "CONFIDENTIAL" on each page containing confidential information. Failure to so mark this information may result in EPA making the information available to the public without further notice to you.

Note that this procedure is similar but not identical to EPA's bona fide procedure codified in 40 CFR §710.7(g) and §720.25(b). If you intend to, but do not currently manufacture or import a substance for commercial purposes and need a search of the Master Inventory File, you must follow the procedures codified in those sections.

EPA's response will inform the manufacturer or importer whether the chemical substance is on the Inventory and whether the substance is subject to reporting under the Inventory Update Rule.

If the chemical substance is found on the confidential Inventory, EPA will notify the person(s) who originally reported the substance that another person has requested information pursuant to the Inventory Update Rule procedures, and therefore was told that the chemical substance is on the Inventory and that it is subject to reporting.

If you are an importer and cannot provide all of the required information because your foreign manufacturer/supplier is maintaining it as confidential, the manufacturer/supplier can send the information directly to EPA. Be advised that it is the obligation of the importer to insure that the foreign manufacturer complies with the requirements of the IUR.

Because searches of the Master Inventory File require a considerable amount of time to process, you are urged to request such a search only if your search of the public version of the Inventory, commercial databases, and your company's records fails to resolve your question. Moreover, if your request is not received prior to October 25, 1994, EPA cannot guarantee that you will receive a response in time for you to complete the reporting form before the end of the reporting period.

3. Excluded substances. Four categories of substances, though included on the Inventory, are largely excluded from reporting under the Inventory Update Rule. These categories are polymers, inorganic substances, microorganisms, and naturally occurring substances. Refer to section 710.26 of the Inventory Update Rule and to the preamble of the Federal Register notice announcing the rule (51 FR 21438) for precise definitions of these categories.

The Inventory Update Rule definition of polymer is sufficiently broad to include virtually all those substances that are generally considered polymers. These include polysaccharides such as agar and gums, and all classes of proteins, enzymatic or structural. However, substances which result from hydrolysis, depolymerization, or chemical modification of polymers such that the final products are no longer polymeric (e.g., a mixture of amino acids which is the result of hydrolysis of a polypeptide) are not considered to be polymers, and must be reported if not otherwise excluded. For reporting purposes, salts of polymers are also considered to be polymers.

a. Determining whether a substance is excluded. To assist in identification of excluded substances, most of these substances are labelled in the printed and computer-readable versions of the Inventory with an "XU" flag. However, due to difficulties in developing a computer algorithm for identifying all such substances in the Inventory, EPA was not able to flag all excluded substances. For example, inorganic substances and biopolymers found in the UVCB Index section of the Public Inventory (chemical substances of unknown or variable composition, complex reaction products, and biological materials) are frequently not labelled with an XU flag.

A few of the polymerization gases which are not considered to be polymers might have been incorrectly flagged because of the inclusion of the word "polymer" in the chemical name. These substances are nevertheless reportable under the IUR.

Submitters are advised to utilize the flag only as a guide: submitters will be responsible for verifying exemptions. If a substance does not bear an XU flag and section 710.26 of the Inventory Update Rule does not provide sufficient guidance to determine whether the substance is excluded, you may request assistance from EPA (see Section VI, below, for inquiries). In addition, the following substances, though not flagged with the XU designation, nonetheless belong to a category excluded from Inventory Update Rule reporting:

<u>Name</u>	<u>CAS Registry Number</u>
Carbon black	1333-86-4
Carbon	7440-44-0
Graphite	7782-42-5
Charcoal	16291-96-6

b. When an excluded substance must still be reported. With the exception of naturally occurring substances, a chemical substance which falls into one of the excluded categories must still be reported if it is the subject of a rule proposed or promulgated under section 4, 5(a)(2), 5(b)(4), or 6 of TSCA, of an order issued under section 5(e) or 5(f), or of relief which has been granted under a civil action under section 5 or 7. A list of all substances which fall into one of these categories is contained in Appendix A at the back of these instructions. However, if you are unable to determine whether the specific chemical substance you manufacture falls within one of the generic chemical names listed in the appendix, you may ask EPA whether the specific substance is reportable by following the procedures outlined on page 3 of this manual.

B. Determining whether you are a manufacturer or importer who is required to report a substance.

Even if you manufacture or import a substance reportable under the Inventory Update Rule you may be exempt from the reporting requirements for that substance. Questions relevant to whether you must report include:

- 1) Did you manufacture or import 10,000 pounds (4,540 kilograms) or more of the reportable substance at any single site during the corporate fiscal year immediately preceding the reporting period?
- 2) Do you qualify as a small manufacturer with respect to the substance?
- 3) Did you manufacture or import the reportable substance under circumstances which do not require reporting?

1. Manufacture or import of 10,000 pounds or more.

a. Manufacturers and Importers. Reporting for the Inventory Update Rule is done by individual site of manufacture or by the organizational site which controls importation. For the purposes of the following discussion, manufacturers and importers are treated separately.

Manufacturers. A manufacturer is defined at 40 CFR §704.3. The word "manufacture" is defined at 40 CFR section 710.2(o) and also at 40 CFR section 704.3.

Importers. The site of importation is defined in section 710.28(c) of the Inventory Update Rule as the site of the operating unit which is directly responsible for importing the substance and which controls the import transaction. In some cases this may be the site of your headquarters, in others a specific plant site or a broker.

Importers under TSCA are defined in 40 CFR §704.3 and §710.2(l). Although for a given substance that your company is importing at a given site more than one person may meet the criteria in sections 704.3 and 710.2(1), only one should report.

Exporters. A manufacturer of an IUR reportable chemical substance manufactured solely for export is required to report and otherwise comply with all IUR requirements applicable to manufacturers of all IUR reportable chemicals.

b. Meeting the 10,000 pound annual production volume threshold.

Reporting is required for a chemical substance only if you manufactured or imported 10,000 pounds (4,540 kilograms) or more of the substance at any single site you owned or controlled during the corporate fiscal year immediately preceding the reporting period (see Section III.B., below, for more information about fiscal year). Moreover, if during the year you manufactured 10,000 lbs. or more of the substance at some sites and less than 10,000 lbs. at other sites, you need to report the substance only for those sites at which you manufactured or imported 10,000 lbs. or more.

Companies that both manufacture and import the same substance. Such companies should add the manufacturing and importation volume at each site (see above to determine site of importation) to determine whether the 10,000 pound threshold has been met. For example, if you manufacture 5,000 pounds of a reportable substance and import 6,000 pounds, you should report.

Substances in a mixture. Although mixtures as defined in 40 CFR §710.2(q) are not reportable, the chemical substances of which a mixture is comprised are reportable. If you manufacture the substances as part of a mixture, you must determine for each substance in the mixture whether the production volume was over 10,000 pounds. Similarly, if you import a mixture you must determine for each substance in the mixture whether its importation volume was 10,000 pounds or more. Note that a person who creates a mixture by combining existing substances without a chemical reaction is not a manufacturer of those substances and therefore does not report those substances under the Inventory Update Rule.

Recordkeeping requirement. Even if you manufacture/import less than 10,000 pounds of a reportable substance at a site, you must maintain records documenting that fact (see Section IV.G. below, page 25).

2. Small Manufacturers. (For the purposes of the following discussion, the term "manufacturers" refers to both manufacturers and importers.) Small

manufacturers are usually exempt from reporting under the Inventory Update Rule (but see below for a discussion of when small manufacturers are not exempt). You qualify as a small manufacturer if you meet either one of the following tests:

- 1) If your total annual sales, combined with those of your parent company, domestic or foreign (if any), do not exceed \$4 million, regardless of annual production volume you qualify as a small manufacturer.

or

- 2) If your total annual sales, combined with those of your parent company, domestic or foreign (if any), are less than \$40 million, you qualify as a small manufacturer with respect to a particular substance for those plant sites at which the annual production volume of the substance does not exceed 100,000 lbs. If the annual production volume of the substance at any of your sites is over 100,000 lbs., you are required to report only for those sites. Note that it is possible to qualify as a small manufacturer with respect to some substances and not others, or some plant sites and not others.

See 40 CFR §704.3 for a more complete discussion of the small manufacturer exemption.

When a small manufacturer must still report. Even if you qualify as a small manufacturer you must still report if you produced 10,000 lbs. or more of a reportable substance which is the subject of (1) a rule proposed or promulgated under section 4, 5(b)(4), or 6 of TSCA, (2) an order under section 5(e), or (3) relief granted under a civil action under section 5 or 7. A list of all substances which fall into one of these categories is contained in Appendix A.

3. Additional reporting exemptions. Persons who manufacture or import reportable substances under the following circumstances are not required to report for those substances under the Inventory Update Rule:

- 1) The chemical substance is manufactured or imported solely in small quantities for research and development.
- 2) The chemical substance is imported as part of an article.
- 3) The chemical substance is manufactured as an impurity, byproduct, or non-isolated intermediate, or in a manner incidental to another operation or upon end use of another substance or mixture, as described in 40 CFR §720.30(g) and (h) (see 48 Fed. Reg. 21746, May 13, 1983).

- 4) All the information required by the Inventory Update Rule was reported to EPA pursuant to a rule under section 8(a) of TSCA between August 25, 1993 and August 24, 1994.

Articles. An article is defined in 40 CFR §710.2(f) as "a manufactured item (1) which is formed to a specific shape or design during manufacture, (2) which has end use function(s) dependent in whole or in part upon its shape or design during end use, and (3) which has either no change of chemical composition during its end use or only those changes resulting in compositions which have no commercial purpose separate from that of the article and that may occur as described in section 710.4(d)(5), except that fluids and particles are not considered articles regardless of shape or design."

EPA considers imported items as articles if they are manufactured in a specific shape or design for a particular end use application, and this design is maintained as an essential feature in the finished product. Thus, materials such as metal or plastic sheets, wire, coated fabric, rolled carpet, sheets of plywood and other similar materials will be viewed as articles by EPA, even if, for example, subsequent to import they are rolled or drawn thinner, cut, printed, laminated, or thermoformed, so long as they meet the above criteria. Substances which are part of such articles are not subject to reporting under the Inventory Update Rule.

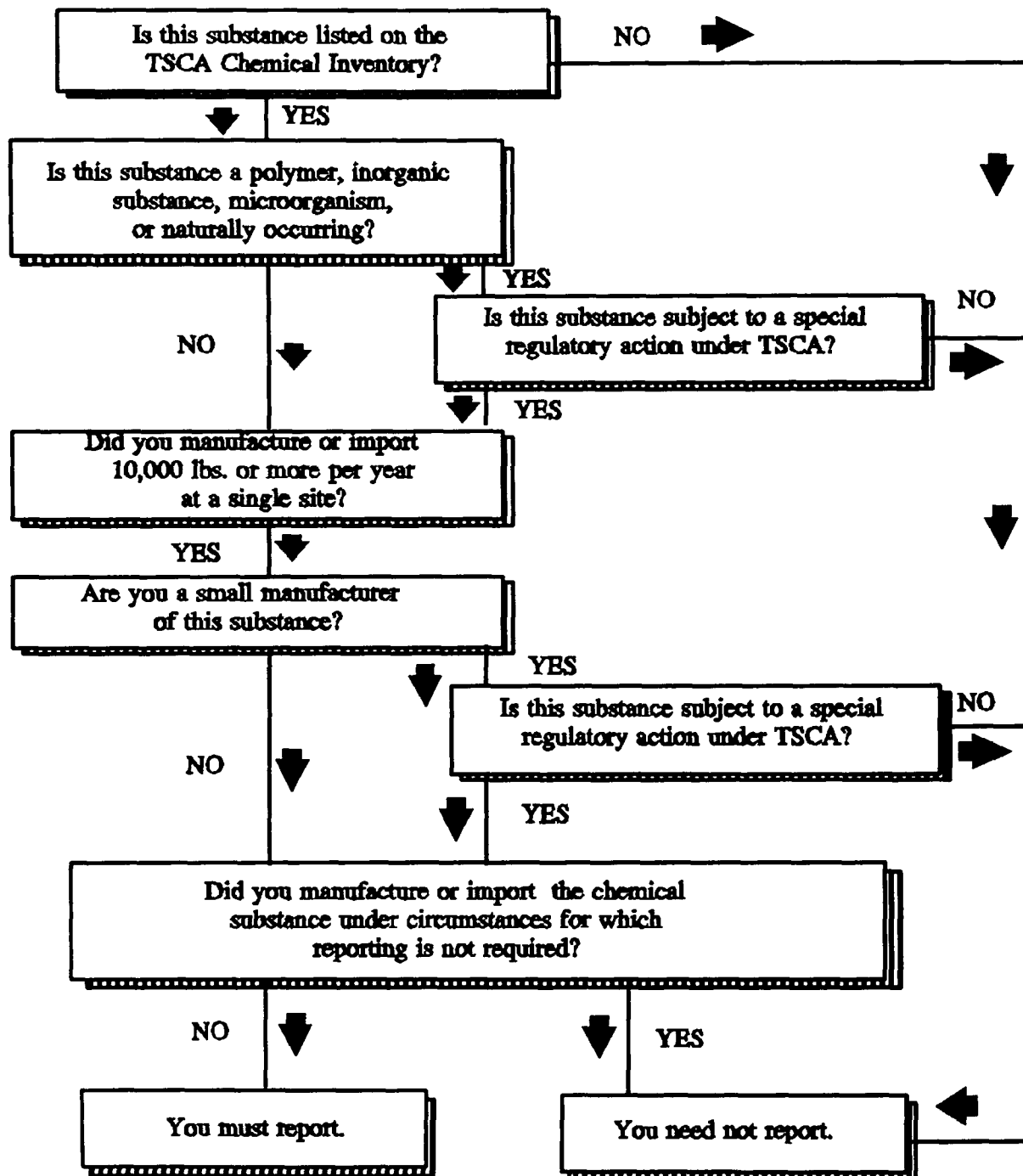
If an item is manufactured in a particular shape for the purpose of shipping convenience and the shape has no function in the end use, it would not be considered an article. Thus, chemical substances which are part of items such as metal ingots, billets, and blooms are subject to reporting under the Inventory Update Rule.

Duplicative reporting unnecessary. If between August 25, 1993 and August 24, 1994 you submitted the information required by the Inventory Update Rule in response to another rule promulgated under section 8(a) of TSCA (e.g. the Preliminary Assessment Information Rule, 40 CFR §712, Subpart B, or the Comprehensive Assessment Information Rule, 40 CFR §704, Subpart D), you are not required to report under the Inventory Update Rule for the same substance during 1994.

C. Decision making flow chart.

The following flow chart summarizes the questions which must be answered to determine your reporting obligations for a particular substance. (For simplicity's sake, not all reporting exemptions are included in the flow chart.)

Decision Making Flow Chart for Reporting Under the Inventory Update Rule



D. Manufacture or importation of chemical substances subject to TSCA but not included on the Inventory.

When checking the chemical substances you manufacture or import against the TSCA Chemical Substances Inventory you may discover that you are manufacturing or importing substances which are not on the Inventory but which should have been reported to EPA and never were. Such manufacture or importation is in violation of section 15 of TSCA and could subject you to administrative or criminal penalties.

Note that hydrates are not listed on the Inventory. You are required to report the CAS Registry number of the corresponding anhydrous form. Adjust the reported production volume to exclude water.

If you are manufacturing or importing a substance which was previously on the Inventory but which has subsequently been delisted, then you are in violation and must follow the directions below.

If you find that you have or may have manufactured or imported chemical substances in violation of TSCA, you should contact the Agency at the following address:

Director
Toxics and Pesticides Enforcement Division
Office of Regulatory Enforcement (2245)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Information in your letter may be claimed as confidential by circling or bracketing the text to be protected and marking the page, "CONFIDENTIAL." Failure to so mark this information may result in EPA making the information available to the public without further notice to you.

Significant reductions in penalties are given for persons voluntarily disclosing violations. Note, however, that continued manufacture or importation of such chemical substances remains illegal even after you have contacted the Agency, until the requirements of TSCA have been met.

III. WHEN YOU MUST REPORT

The Inventory Update Rule establishes reporting periods every four years. The first reporting period was during 1986; the second was during 1990; the third period is during 1994. A reporting period serves two functions:

- 1) It is a 120-day period during which reports for the Inventory Update Rule must be filed.
- 2) It is used to determine the applicable fiscal year for calculating annual production volume.

A. You must report during the 120-day reporting period.

The next reporting period begins August 25, 1994 and ends December 23, 1994. All submissions must be postmarked no later than December 23, 1994. If you are required to report (see Section II., page 2), failure to file your report during this period is a violation of section 15 of TSCA.

Persons requesting searches of the Master Inventory File (see Section II.A.2., page 2, 3) must make their requests at least 60 days prior to the close of the reporting period. If you have made your request in time you will be allowed 15 business days from the date of receipt of EPA's answer or until the end of the reporting period, whichever is later, to submit the report for the substance which was searched. Any other reports received after the end of the reporting period will be considered late and will be subject to enforcement action.

B. Determine annual production using the reporting period as a reference point.

To determine whether you manufactured or imported 10,000 lbs. or more of a reportable substance at a site, you must determine your total manufacture/import volume for your last corporate fiscal year which ends prior to August 25, 1994. For example, someone whose fiscal year is the calendar year would determine manufacture or import volume for the period January 1, 1993 - December 31, 1993, while someone whose fiscal year is July 1 to June 30 would determine manufacture or import volume for the period July 1, 1993 to June 30, 1994.

Note that even though you may be exempt from reporting a chemical substance during one reporting period because you manufactured or imported less than 10,000 lbs. during the applicable fiscal year, you may be required to report it during the next reporting period if during the next applicable fiscal year the production volume increases to 10,000 lbs. or more.

IV. HOW TO REPORT

A. Form of submission.

Information reported for the Inventory Update Rule must be submitted either on Form U or by electronic means (see subsections C., page 15 and D. page 23). Separate forms are required for each plant site.

For the 1994 reporting period, Form U has been made readable by Optical Character Recognition (OCR) technology. OCR is an electronic data entry means that will help ensure that the information submitted for the IUR will be correctly and quickly entered into the data base. In OCR, a light beam is passed over the paper, and the information on the page is 'recognized' as text. This process requires that the text be typed (or written very clearly in capital letters), so that the machine can properly recognize the characters on the form. You may only use an original form for reporting.

B. Confidentiality.

Information submitted to EPA under the Inventory Update Rule may be claimed as confidential business information (CBI) by checking the appropriate "CBI" boxes on Form U. Claims of confidentiality will not be accepted and honored if they are not asserted at the time information is submitted to EPA or submitted in a manner inconsistent with the rule and reporting instructions.

You may assert a CBI claim for the specific identity of a chemical substance only if EPA treats that substance identity as confidential on the Inventory at the time your report is submitted (i.e., the substance is not on the Public Inventory). Both confidential and non-confidential substances may be reported on the same form, and confidential substances may be included in diskette submissions.

If you are manufacturing or importing a chemical substance which is currently listed on the Inventory as confidential you are encouraged not to assert confidentiality claims if circumstances are now such that confidentiality is no longer necessary. If you report a previously confidential substance as non-confidential (see subsection C, below, for specific instructions) that substance will subsequently be listed on the Inventory as non-confidential.

No CBI claim for chemical identity will be accepted unless accompanied by a separate written substantiation for each chemical substance claimed as CBI, with detailed answers to the eleven questions prescribed in section 710.38 of the Inventory Update Rule, and repeated below. The answers must be complete and specific to the chemical substance in question. The substantiation must be dated and signed by an officer of the company. If the required substantiation does not accompany your Form U, EPA may make the chemical identities reported on the form available to the public without further notice to you.

Information in a substantiation may itself be claimed as CBI by circling or bracketing the text you wish to claim as confidential and marking the page "CONFIDENTIAL." Failure to so mark this information may result in EPA making the information available to the public without further notice to you.

The eleven questions to be answered in the substantiation are:

- 1) What harmful effects to your competitive position, if any, do you think would result from the identity of the chemical substance being disclosed in connection with reporting under this subpart?
- 2) How long should confidential treatment be given? Until a specific date, the occurrence of a specific event, or permanently? Why?
- 3) Has the chemical substance been patented? If so, have you granted licenses to others with respect to the patent as it applies to the chemical substance? If the chemical substance has been patented and therefore disclosed through the patent, why should it be treated as confidential?
- 4) Has the identity of the chemical substance been kept confidential to the extent that your competitors do not know it is being manufactured or imported for a commercial purpose by anyone?
- 5) Is the fact that the chemical substance is being manufactured or imported for a commercial purpose publicly available, for example in technical journals, libraries, or State, local, or Federal agency public files?
- 6) What measures have you taken to prevent undesired disclosure of the fact that this chemical substance is being manufactured or imported for a commercial purpose?
- 7) To what extent has the fact that this chemical substance is manufactured or imported for commercial purposes been revealed to others? What precautions have been taken regarding these disclosures? Have there been public disclosures or disclosures to competitors?
- 8) Does this particular chemical substance leave the site of manufacture in any form, as product, effluent, emission, etc.? If so, what measures have you taken to guard against discovery of its identity?
- 9) If the chemical substance leaves the site in a product that is available to the public or your competitors, can the substance be identified by analysis of the product?
- 10) For what purpose do you manufacture or import the substance?

11) Has EPA, another Federal agency, or any Federal court made any pertinent confidentiality determinations regarding this chemical substance? If so, please attach copies of such determinations.

C. Completing Form U.

1. Report only using original copies of Form U.

Each copy of Form U bears an individual report number, and is readable by optical character recognition (OCR) technology. Do not report on a photocopy of Form U, because it will not have a unique report number and will not be OCR-readable. See Section V (page 27) for obtaining copies of Form U.

2. Certification Statement.

a. Signature. The certification statement must be signed by an officer of the company. This statement certifies to the truth and accuracy of the information reported and of the confidentiality claims made on the form (see the back of Form U for details). Note that by certifying the truth and accuracy of the information on the form, you acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. Sign in black ink to ensure that the form bears a legible signature which can be microfilmed or otherwise archived.

b. Date. Enter the month, day, and year that the form was signed.

c. Name and Title. Enter the name and title of the person who signed the certification statement.

3. Technical Contact and Company Information.

a. Technical Contact Name. Enter the name of the person whom EPA may contact for clarification of the information submitted on Form U. The technical contact need not be located at the site for which information is reported, but should be located in the U.S. If you wish to identify more than one person as a technical contact, please include the extra name(s) in a separate cover letter.

b. Company Name, Address Line I, Address Line II, Telephone Number. Use this block to enter the company name and street address. Please use standard addressing techniques as established by the U.S. Postal Service. Post office box numbers are only acceptable if also accompanied by a street address. If a post office box is listed, it should be listed after the street address on Address Line II. The telephone number listed should be that of the technical contact.

c. CBI. Checking the CBI box in this block asserts a confidentiality claim for the link between your company and all the chemical substances reported on the form.

Checking other CBI boxes on the form will not protect this link. If there are some substances whose connection to your company you do not require to be kept as confidential, report those substances on a separate form on which the CBI box in the Company block is not checked.

4. Plant Site Information.

Reporting under the Inventory Update Rule is done by individual site. Therefore all the substances reported on one form must be manufactured/imported at the same site. Enter the name, street address, and Dun & Bradstreet number of the site here. The plant site name should be listed as a concatenation of the company name and plant site name (e.g., Acme Intl-Madison Plt). (See sample form on page 18)

a. Dun & Bradstreet Number. Dun & Bradstreet gives separate numbers to plant sites and parent companies; make sure that the number you provide EPA belongs to the individual plant site for which you are reporting. If the plant site does not have a Dun & Bradstreet number, a Dun & Bradstreet number assignment can be requested from your local office of Dun & Bradstreet. Dun & Bradstreet does not charge for this service, and does not require that you disclose sensitive financial information in order to get a number. **Do not report the headquarters Dun and Bradstreet number unless the reporting site corresponds to that number.**

b. Address. A street address, including Zip code, must be reported. Post office box numbers are not acceptable. If the site does not have a street address, please provide what descriptive site information you have, including the Zip code.

See Block G, below, concerning CBI claims for the link between plant site identity and individual substances.

5. Chemical Substance Identity/Activity/Confidentiality.

a. Line Number (block A). This part of the form is divided into ten lines to allow reporting of up to ten chemicals per form. Each line should represent one chemical. If the chemical identity will not fit on one line, rather than using a second line, you should truncate the name with the use of an ellipsis (...) indicating an omission of letters or words. (e.g., utilize the available space and if you can not include the complete name, end it with a series of full stops or period dots.)

b. CAS Registry or Other Identifying Number. Every chemical substance reported on Form U must be accompanied by its Chemical Abstracts Service (CAS) Registry Number (see lines 1, 8, and 10 of sample form) or other identifying number. The printed edition of the Inventory contains detailed instructions on how to locate the CAS Registry Number for a substance listed therein. **When you report a CAS Registry Number, please verify that the number you are reporting is the correct number for your substance.**

You may be unable to find a CAS Registry Number in the Public Inventory either because the substance is listed as confidential (in which case the specific identity is not present and the chemical substance has an Accession Number rather than a CAS Registry Number) or because the substance was not on the Inventory as of the date of printing. If this is the case you may use one of the following acceptable identifying numbers:

- 1) EPA Accession Number;
- 2) Original Inventory Report Form Number;
- 3) Premanufacture Notice Number;
- 4) Bona Fide Document Control Number; or
- 5) Test Market Exemption Application Number.

Use one of the above identifying numbers only if you cannot locate the CAS Registry Number for a substance or you are uncertain whether the CAS Registry Number you have located is correct. The CAS Registry number is the preferred identifier for chemical substances reported.

SAMPLE 1994 IUR FORM

 FORM U	United States Environmental Protection Agency Washington, DC 20460 1994 Partial Updating of TSCA Inventory Data Base Production and Site Report (Section 8(a) Toxic Substances Control Act 15 USC 2607) <small>Declaration Statement: I hereby certify to the best of my knowledge and belief that (1) all information entered on this form is complete and accurate and (2) the confidentiality statements on the back of this form are true and correct as to that information for which I have asserted a confidentiality claim.</small>	Form Approved OMB 5070-0070 Approval Expires 5-31-95 REPORT NUMBER <div style="border: 1px solid black; padding: 5px; display: inline-block;">61121234</div>																																																																																																																																																																								
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<small>EPA Form 7746-6 (2-94) IMPORTANT: Before completing this form, carefully read the accompanying instructions. TYPE or PRINT</small>																																																																																																																																																																										

The substances on this sample form are listed as confidential only for purposes of illustration.

(1) EPA Accession Number. (See line 2 of sample form.) If the identity of a chemical substance on the Inventory is confidential, the printed Inventory lists an Accession Number for that substance and uses a generic name rather than a specific identity. You may use an Accession Number as an identifying number only if EPA has communicated the appropriate Accession Number to you, e.g., following your report for the original Inventory in 1978 or 1979, or following commencement of manufacture or import of a substance for which you filed a premanufacture notice. If you find a generic chemical identity in the printed Inventory which you think belongs to your substance, and report using the Accession Number which pertains to that substance, you may possibly report for the wrong substance. An Accession Number may not be used for a non-confidential chemical substance. A typical Accession Number would be "29735".

(2) Original Inventory Report Number. In 1978 and 1979, submissions for the Initial and Revised TSCA Chemical Substance Inventories were filed on one of four forms, "A", "B", "C", or "E". You may use that original Inventory report form number as an identifying number. A typical Original Inventory Report Number would be "12345678".

Since both "A" and "B" forms allowed reporting of several chemical substances on a single form, EPA needs to know the line number on the original "A" or "B" form that the substance occupied. If you use an original Inventory report number from an "A" or "B" form (these form numbers begin with "1" or "2") you must therefore include the original line number for that chemical substance, separated from the form number by a slash. For example, if a chemical substance has been reported on line number 3 of form 12345678, report the identification number as "12345678/003"; (see line 9 on sample form). Add leading zeroes to make the line number three digits long, e.g. # "001", "012", or "123". If you originally reported on a "C" or "E" form (form numbers beginning with "3" or "5"), include a slash and line number of 001 (see lines 4 and 5 on sample form).

If you submitted a correction to an original Inventory report, use the number of the form on which you submitted the correction. Be sure to add a line number (001), as above.

(3) Premanufacture Notice Number. (See line 6 of sample form.) If you filed a Premanufacture Notice (PMN) for a substance which is now reportable under the Inventory Update Rule and that PMN was assigned a PMN number, you may use that as an identifying number. A typical PMN number would be "P-85-0243" or "P-83-0001A". The four digit block of numbers must be right justified with leading zeros as needed. The eighth space is reserved for an optional alpha character suffix (A, B, etc.) and should be used only if one has been assigned by EPA. Please be sure to include the dashes in the correct locations.

Please be aware that a chemical substance which has a PMN number is not automatically reportable under the Inventory Update Rule. A PMN substance is

reportable under the IUR only if it is included on the Inventory. A PMN substance is included on the Inventory only if a Notice of Commencement was received by EPA for the substance.

(4) Bona Fide Request Control Number. (See line 3 of sample form, page 18) If you filed a Bona Fide Intent to Manufacture or Import a chemical substance which is now reportable under the Inventory Update Rule (see 40 CFR §710.7(g) or §720.25(b)), you may use the document control number assigned to that submission by EPA as an identifying number. A typical Bona Fide document control number would be "528500287".

The fact that you filed a Bona Fide for a substance does not necessarily mean that the substance is on the Inventory and reportable; you must have independent confirmation that the substance is on the Inventory (most likely in a communication from EPA).

(5) Test Market Exemption Application Number. (See line 7 of sample form.) If you filed a Test Market Exemption Application (TMEA) for a substance which is now reportable under the Inventory Update Rule, the number assigned by EPA to that application may be used as an identifying number. A typical TMEA number would be "T-85-0243" or "T-83-0001A". The four digit block of numbers must be right justified with leading zeros as needed. The eighth space is reserved for an optional alpha character suffix (A, B, etc.) and should be used only if one has been assigned by EPA. Please be sure to include the dashes in the correct locations. You should use a TMEA number only if you know that the chemical substance is on the Inventory.

Procedures for obtaining CAS Registry Numbers and Accession Numbers from EPA when you previously reported the substance to the Agency. If by one of the methods discussed in Section II.A. (page 2), you were able to determine that the substances you manufacture are on the Inventory, you should already have identifying numbers for them. If you do not know any of the above identifying numbers for a substance you are unlikely to be certain that the substance is on the Inventory. If this is the case you should reread Section II.A. Following the procedures in that section should enable you to find an identifying number.

There may be some manufacturers or importers who reported for the Inventory in 1978 or 1979 but no longer have the original report forms. In this case you may request an identifying number from EPA. Send a letter to the following address:

OPPT Document Control Officer
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (7407)
401 M Street, S.W.
Washington, DC 20460
Attn: Inventory Update Rule

The letter must include the specific identity of the chemical substance, must be signed by an officer of the company, and must designate a technical contact (include name, title, address, and telephone number). The structure of the substance, if available, should also be provided. Note that this procedure can be used only when you have previously reported the substance to the Agency; if you need EPA to tell you whether the substance is on the Inventory you must follow the procedures in Section II.A.2. (page 3).

Information on this letter may itself be claimed as confidential by circling or bracketing the text to be protected and marking the page "CONFIDENTIAL." Failure to so mark this information may result in EPA making the information available to the public without further notice to you.

EPA will release information in response to these letters only to the company which originally submitted the information. If company ownership has changed or the technical contact authorized to receive confidential information has changed since you reported the substance to EPA during 1978 - 1980, you must include a notarized letter by an officer of the current surviving chemical company certifying to the change and designating the new technical contact.

EPA will send to the technical contact a CAS Registry Number (if the substance is listed as non-confidential on the Inventory) or an Accession Number (if the substance is confidential).

EPA will release CAS Registry Numbers or Accession Numbers in response to these letters only for substances which are reportable under the Inventory Update Rule. Your letter must be received by November 12, 1994; otherwise the Agency cannot guarantee a response in time for you to meet your reporting obligations.

c. A, B, C, F, P, or T Codes (block C). Indicate in this column the type of identifying number you entered in column B, as follows:

If the number you are reporting in block B is a(n)	Type this code in block C
---	------------------------------

Accession Number	A
Bona Fide Number	B
CAS Registry Number	C
Original Inventory Report Number	F
Premanufacture Notice (PMN) Number	P
Test Market Exemption Application (TMEA) Number	T

d. Specific Chemical Name (block H). Enter the specific chemical identity of the chemical substance you are reporting. Chemical Abstracts Index or Preferred Names should be used if available. For non-confidential substances, these names can

be found in either the printed or the computer-readable version of the Public Inventory. If such names are not available, you must use nomenclature which completely and accurately describes the chemical substance.

If the chemical identity will not fit on one line, you should truncate the name at the end of the line with the use of an ellipsis (...) indicating an omission of letters or words. Each line should represent one chemical. (See line 4 of sample form, page 18) Do not continue the chemical identity to the next line.

Trade names may not be used except where a trade name describes a reactant which is part of the identity of a chemical substance you are reporting and your supplier will not disclose to you the specific identity of the trade name reactant. Report all such chemical substances on a separate form, entering the specific identities of reactants where you know them and the trade names where you do not. You must also submit along with Form U a letter certifying that your supplier will not disclose to you the specific identity of the trade name reactant and identifying the supplier of each trade name reactant reported.

Information in this letter may be claimed as confidential by circling or bracketing the text to be protected and marking the page, "CONFIDENTIAL." Failure to so mark this information may result in EPA making the information available to the public without further notice to you.

If you are an importer whose foreign supplier will not reveal to you the identity of the substance you are reporting, follow the procedures in subsection H. (page 25).

If you are claiming the chemical identity as confidential, check the Chemical CBI box in block G.

e. Activity: Manufacture or Import (block D). If you manufacture the substance, enter "M" in the Activity box; enter "I" if you import the substance. If you both manufacture and import the substance at the same site, use two lines to report, one for each activity. Check the CBI box if you wish to claim the nature of the activity (i.e., manufacture vs. importation) as confidential for the substance. **Claiming activity as CBI does not protect the link between your company and the substance; that will not be protected unless you check the CBI box next to Company Name.**

f. Site Limited (block E). If you manufacture the chemical substance at the plant site identified and do not distribute the chemical substance or any mixture containing that substance outside the plant site for commercial purposes, enter "X" in the space next to the CBI box. Otherwise leave the space blank. (Note: an imported chemical substance cannot be reported as site-limited.) If you wish to claim this information as confidential for the substance, check the CBI box. You may claim the fact that a substance is not site limited as confidential, if appropriate.

g. Production Volume (block F). Enter your annual manufacture volume or importing volume, in pounds, for the fiscal year preceding the reporting period. If you both manufacture and import a particular substance, report the manufacture and import volumes separately, on two lines. The quantity should be reported to at least two significant figures, and should be accurate to the extent known or reasonably ascertainable by you (if the figure reported is within $\pm 10\%$ of the actual value, it is acceptable for purposes of the rule). Production volumes must be reported in numeric format ("2 million" or "Ex10" are not acceptable): Abbreviations such as M or K are also not acceptable. (Volumes reported in other than numeric format cannot be read by the Agency's automated equipment.) If you wish to claim this information as confidential for this substance, check the CBI box.

h. Plant site and Chemical CBI Claims (block G).

(1) Plant site CBI claim. If you wish to claim the site of manufacture/import as confidential, check the "Plant CBI" box. Note that you may claim this connection as CBI for some chemical substances on the form while not making that claim for others.

(2) Chemical identity CBI claim. The identity of a substance which is listed as confidential on the TSCA Inventory may be claimed as confidential by checking this box. EPA will not honor a chemical identity CBI claim for a substance which is listed on the non-confidential Inventory. Note that checking this box does not protect the link between your company and the substance; it only asserts a CBI claim for the specific identity of the substance. If you wish to claim company identity as CBI, check the CBI box next to Company Name on the upper portion of the form.

D. Reporting by diskette.

1. General. In 1986 submitters were offered the option of submitting reports on computer tape. For the 1990 collection, the option was expanded to include diskettes. In this 1994 reporting period magnetic media submissions are again encouraged; however, only diskettes will be accepted.

2. Copies of Form U required. All diskettes must be accompanied by a separate copy of Form U for each plant site reported. On the written form complete only the technical contact and company information described in subsections IV.C.3. and 4., on pages 15 and 16. The remainder of the form should not be filled in. In its place include a statement that the required information is being submitted on diskette, plus diskette identifier information (this should match the information on the label affixed to the diskette).

3. Diskette formats and physical characteristics.

See Appendix B for instructions on providing submissions on diskette.

4. Information on individual chemical substances.

See Appendix B and instructions for completing the Chemical Substance Block in Section C., above.

E. Sending forms and diskettes to EPA.

Send the original form, along with any accompanying diskettes, to the following address:

OPPT Document Control Officer
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (7407)
401 M Street, S.W.
Washington, DC 20460
Attn: Inventory Update Rule

F. Correcting errors in submissions for the original Inventory.

In reporting under the Inventory Update Rule you may find that an error was made when you reported for the original Inventory in 1978 or 1979. If that error falls into one of the following categories:

- 1) the chemical identity originally reported was incomplete or inaccurate;
- 2) an isolated intermediate occurring during the manufacture of a substance previously reported for the Inventory was not then recognized; or
- 3) EPA informed your company of a reporting error and requested a correction from you, to which you did not respond;

you should file an Inventory Correction, following the procedures outlined in the Federal Register notice of July 29, 1980 (45 FR 50544). Be sure to reference the original Inventory report form and line number (if appropriate) when you file a correction.

For copies of the Federal Register notice or further assistance with an Inventory Correction, you may contact:

TSCA Hotline
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (7408)
401 M Street, S.W.
Washington, DC 20460
Telephone: (202) 554-1404

Inventory Correction requests should be submitted to EPA with your copies of Form U. Note that your Form U should report the chemical substance you are actually manufacturing or importing. The correction should be explained in a cover letter by specifically referencing the number of the correction form, the Form U number, and the Form U report line number.

The act of correcting errors in submissions to the Original Inventory does not grant to the person making the correction immunity from enforcement action for any possible violations of the Original Inventory Reporting Rule.

G. Recordkeeping requirements.

Persons subject to the Inventory Update Rule are required to maintain records that document the information contained in their submissions. These records must be kept for four years after the effective date of the applicable reporting period. As long as the records are maintained in a manner consistent with normal business practice, you may determine their exact format. Required records include those that show the production volume, plant site, and site-limited status of each substance reported. If a substance is not reported because its site-specific annual production is less than 10,000 pounds, only the site-specific production records for that substance need to be kept. Persons who qualify as exempt small manufacturers need to keep records only for those chemical substances which they are required to report; however, in claiming an exemption they bear the burden of documenting that they qualify for the exemption.

H. Special instructions for importers and foreign suppliers.

This section applies to importers who do not know the specific chemical identity of a substance because the foreign supplier chooses to keep it confidential. If you are such an importer, you are still responsible for ensuring that the information is submitted to EPA. You may accomplish this by having your foreign supplier complete some of the information on Form U, as follows:

- 1) Include a cover letter with your submission, stating the following: "The identifying numbers and specific chemical identities for the substances on this form and the technical contact will be submitted by our foreign supplier."
- 2) Use a separate Form U for each foreign supplier who does not inform you of the identity of the chemical substances you are importing. Do not report by diskette. Do not use the same report form for substances whose specific identities you do know.
- 3) Make a photocopy of a blank Form U before entering any information on the form.

- 4) On the original copy, sign the certification statement, enter the technical contact, and complete blocks D, E, F and G for each chemical substance. In block B, instead of entering the identifying number, enter the trade name or other designation by which you know each chemical substance. Leave column C blank. Check the "Chemical CBI" box in block H only if you wish to claim the identities of the chemicals identified on the form as confidential (you must answer the substantiation questions described in subsection B., page 13). Your foreign supplier is responsible for his own CBI claim. Send this copy to EPA.
- 5) On the photocopy of the blank form, enter only the plant site information. Send this copy to your foreign supplier.
- 6) The foreign supplier should enter technical contact-company information on his copy (the technical contact here should be the foreign supplier), complete blocks B and C and enter the appropriate specific chemical identities in block H. Make sure that your supplier understands which chemical identities belong with each line number on Form U. If the foreign supplier wishes to claim the chemical identities as confidential, the supplier should check the "Confidential" box in block G and submit a substantiation as described in subsection B., above. The supplier should include with Form U a letter stating that this information is being submitted by a foreign supplier on behalf of the importer, who should be identified. Information in the letter may be claimed as confidential by circling or bracketing the text to be protected and marking the page, "CONFIDENTIAL." Failure to so mark this information may result in EPA making the information available to the public without further notice to the supplier. The supplier should then send the form and letter to EPA.

Note that it is your responsibility to ensure that your foreign supplier understands how to complete his copy of Form U (including any relevant CBI claims) and that the supplier sends the information to EPA by the end of the reporting period. If the supplier fails to submit the information, your company may be subject to an enforcement action.

V. OBTAINING COPIES OF DOCUMENTS CITED IN THESE INSTRUCTIONS

A. Obtaining copies of TSCA regulations.

Copies of TSCA regulations can be obtained by contacting:

TSCA Hotline
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (7408)
401 M Street, S.W.
Washington, DC 20460
Telephone: (202) 554-1404

B. Obtaining copies of the Public Inventory.

1. Obtaining copies of the printed edition of the Public Inventory. Non-confidential Inventory listing can be found in the TSCA Chemical Substance Inventory: 1985 Edition, a complete version of the Public (non-confidential) Inventory current as of July 1985, and in the TSCA Chemical Substance Inventory: 1990 Supplement, a supplement to the 1985 edition current as of February 1, 1990. This printed version contains the CAS Registry Number, Preferred CA Index Name, molecular formula, and if applicable, the substance definition and appropriate EPA flags (including the "XU" flag for substances exempt from reporting under the Inventory Update Rule) for non-confidential substances. For chemical substances whose chemical identity has been claimed as confidential, generic chemical names and EPA accession numbers are listed. Copies may be purchased from:

Superintendent of Documents
Government Printing Office
Washington, D.C. 20402
Order Desk: (202) 783-3238

The price for the 1985 edition is \$161.00 in the U.S. and Canada, \$201.25 elsewhere; the price for the 1990 supplement is \$15.00 in the U.S., and \$18.75 outside the U.S. if ordering by mail use the above address. GPO will also take orders by telephone; MasterCard and Visa are accepted. Refer to stock number 055-000-00254-1 for the 1985 edition, and 055-000-00254-1 for the 1990 supplement. Please allow 4-6 weeks for delivery (longer outside the U.S.).

2. Obtaining the Public Inventory in computer-readable form. The Public Inventory is available in the form of computer tapes or PC diskettes. Both can be obtained from the National Technical Information Service (1-800-553-NTIS). The computer tape version consists of two tapes. The first tape, the Inventory Preferred Name File, is sorted by CAS Registry Number. It contains the CAS Registry Number, Preferred CA Index Name, molecular formula, and if applicable, the substance definition and appropriate EPA flags (including the "XU" flag for substances exempt

from reporting under the Inventory Update Rule) for non-confidential substances. The second tape, the Inventory Synonym Name file, contains the same data elements as the first tape but differs in two ways. First, it is sorted by chemical name, not CAS Registry Number. Second, in addition to the Preferred CA Index names, this file is expanded by the inclusion of valid names (synonyms) as supplied to EPA by Inventory submitters. In contrast to the printed version of the Public Inventory which includes CAS derived synonyms, the synonyms listed on this tape are only those reported to EPA by Inventory submitters.

The PC diskette version is a set of diskettes containing the information on both computer tapes merged together with duplicate information removed. It is in CAS Registry Number order.

The tapes and diskettes only contain information on chemical substances which have not had confidentiality claims made on the chemical identity. They do not reference in any way chemicals on the TSCA Inventory claimed as confidential.

Ordering information for these products may be obtained by contacting:

National Technical Information Service
5285 Port Royal Road
Springfield, VA 22161
Telephone: (703) 487-4650 or (800) 553-NTIS

C. Obtaining copies of Form U.

Copies of Form U may be obtained from:

TSCA Hotline
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (7408)
401 M Street, S.W.
Washington, DC 20460
Telephone: (202) 554-1404

VI. REQUESTING ASSISTANCE IN REPORTING

Should you need information on or assistance in the following areas:

- 1) determining your reporting obligations;
- 2) the mechanics of completing Form U;
- 3) entering data onto computer diskette for submission; or
- 4) determining the status of forms/diskettes you have submitted to EPA,

you may write to or call the following address:

**TSCA Hotline
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (7408)
401 M Street, S.W.
Washington, DC 20460
Attn: Inventory Update Rule
Telephone: (202) 554-1404**

Appendix A

Chemical Substances Subject to Proposed or Final TSCA Rules or Orders

Following is a list of CAS Registry Numbers (for non-confidential chemical substances) or Accession Numbers (for confidential substances) of substances which are subject to proposed or final rules or orders under TSCA sections 4, 5(a)(2), 5(b)(4), 5(e), 5(f), 6, and 7, as of April 1994 (see sections 710.26 and 710.29 of the rule and pages 6 and 8 in these reporting instructions). All chemical substances appearing on this list are subject to IUR reporting. The usual exclusions for polymers, inorganic substances, microorganisms, or small businesses do not apply for substances on this list. The exclusion for naturally occurring substances is still valid, as referenced on page 6 of this instruction manual. If after consulting the list you are uncertain as to the regulatory status of a chemical substance, contact EPA at the address given on page 29 of these reporting instructions.

<u>CAS Registry Number</u>	<u>Regulated Under TSCA Section(s)</u>	<u>CAS Registry Number</u>	<u>Regulated Under TSCA Section(s)</u>
51-79-6	5(a)(2)	75-15-0	4
54-11-5	4	75-25-2	4
57-10-3	4	75-34-3	4
60-29-7	4	75-35-4	4
62-44-2	4	75-38-7	4
62-53-3	4	75-44-5	4
67-63-0	4	75-56-9	4
67-64-1	4	75-70-7	4
70-30-4	4	75-87-6	4
71-36-3	4	75-88-7	5(a)(2)
71-55-6	4	76-01-7	5(a)(2)
72-20-8	4	76-01-7	4
72-57-1	4	78-33-1	4
74-87-3	4	78-59-1	4
74-93-1	4	78-83-1	4
74-95-3	4	78-87-5	4
74-97-5	4	78-93-3	4
75-00-3	4	79-10-7	4
75-02-5	4	79-19-6	4
75-05-8	4	79-22-1	4
75-09-2	4	79-31-2	4
75-12-7	4	79-34-5	4

<u>CAS Registry Number</u>	<u>Regulated Under TSCA Section(s)</u>	<u>CAS Registry Number</u>	<u>Regulated Under TSCA Section(s)</u>
79-94-7	4	95-77-2	4
79-95-8	4	95-80-7	4
80-05-7	4	95-88-5	4
81-07-2	4	95-94-3	4
82-68-8	4	95-95-4	4
84-65-1	4	96-23-1	4
84-66-2	4	96-29-7	4
84-74-2	4	96-37-7	4
85-22-3	5(a)(2)	97-02-9	4
85-22-3	4	97-50-7	4
85-44-9	4	97-63-2	4
85-68-7	4	98-56-6	4
85-69-8	4	98-82-8	4
87-10-5	4	98-86-2	4
87-61-6	4	98-87-3	4
87-63-8	5(a)(2)	98-95-3	4
87-65-0	4	99-28-5	4
87-84-3	4	99-30-9	4
88-74-4	4	99-54-7	4
89-61-2	4	100-01-6	4
89-64-5	4	100-02-7	4
89-69-0	4	100-21-0	4
92-04-6	4	100-40-3	4
92-52-4	4	101-55-3	4
92-66-0	5(a)(2)	101-90-6	4
92-86-4	5(a)(2)	103-65-1	4
94-58-6	4	103-85-5	4
94-74-6	4	104-76-7	4
94-75-7	4	106-37-6	4
94-81-5	4	106-44-5	4
94-82-6	4	106-46-7	4
95-48-7	4	106-47-8	4
95-49-8	4	106-50-3	4
95-50-1	4	106-51-4	4
95-51-2	4	106-90-1	4
95-54-5	4	106-91-2	4
95-56-7	4	106-92-3	4
95-57-8	4	107-04-0	5(a)(2)
95-69-2	5(a)(2)	107-10-8	4
95-76-1	4	107-12-0	4

CAS Registry <u>Number</u>	Regulated Under TSCA <u>Section(s)</u>	CAS Registry <u>Number</u>	Regulated Under TSCA <u>Section(s)</u>
107-13-1	4	122-60-1	4
108-10-1	4	123-30-8	4
108-31-6	4	123-31-9	4
108-39-4	4	123-33-1	4
108-45-2	4	123-54-6	5(a)(2)
108-60-1	4	123-63-7	4
108-67-8	4	123-86-4	4
108-70-3	4	124-17-4	4
108-86-1	4	126-72-7	5(a)(2)/6
108-90-7	4	126-73-8	4
108-94-1	4	126-80-7	4
108-95-2	4	126-98-7	4
109-06-8	4	128-39-2	4
109-77-3	4	131-11-3	4
109-99-9	4	131-89-5	4
110-75-8	4	134-32-7	4
110-80-5	4	140-66-9	4
110-82-7	4	141-78-6	4
111-11-5	4	141-79-7	4
111-40-0	4	143-22-6	4
111-54-6	4	143-33-9	4
111-91-1	4	149-30-4	4
112-34-5	4	149-57-5	4
112-35-6	4	306-83-2	5(a)(2)
112-50-5	4	320-72-9	4
112-90-3	4	328-84-7	4
115-86-6	4	348-51-6	4
116-14-3	4	350-30-1	4
116-15-4	4	353-50-4	4
117-18-0	4	354-33-6	5(a)(2)
117-81-7	4	420-46-2	5(a)(2)
118-75-2	4	428-59-1	5(a)(2)
118-79-6	4	428-59-1	4
120-36-5	4	431-89-0	5(a)(2)
120-58-1	4	488-47-1	4
120-80-9	4	494-03-1	4
120-82-1	4	506-68-3	4
120-83-2	4	541-70-8	4
121-69-7	4	541-73-1	4
122-09-8	4	542-76-7	4

CAS Registry Number	Regulated Under TSCA Section(s)	CAS Registry Number	Regulated Under TSCA Section(s)
556-52-5	4	1634-04-4	4
556-67-2	4	1649-08-7	5(a)(2)
576-24-9	4	1675-54-3	4
576-26-1	4	1705-60-8	5(a)(2)
583-78-8	4	1717-00-6	5(a)(2)
585-07-9	5(a)(2)	1737-93-5	5(a)(2)
591-08-2	4	1940-42-7	4
591-78-6	5(a)(2)	2052-07-5	5(a)(2)
598-31-2	4	2113-57-7	5(a)(2)
606-20-2	4	2136-89-2	4
608-71-9	4	2210-79-9	4
608-93-5	4	2224-15-9	4
615-58-7	4	2238-07-5	4
615-67-8	4	2421-27-4	5(a)(2)
616-23-9	4	2425-01-6	4
622-86-6	5(a)(2)	2425-79-8	4
626-39-1	4	2426-08-6	4
628-63-7	4	2432-99-7	5(a)(2)
636-21-5	4	2461-15-6	4
640-19-7	4	2461-18-9	4
646-06-0	4	2516-92-9	5(e)
680-31-9	5(a)(2)	2528-36-1	4
757-58-4	4	2530-83-8	4
765-34-4	4	2577-72-2	4
811-97-2	5(a)(2)	2615-25-0	5(a)(2)
822-06-0	4	2716-10-1	5(a)(2)
827-94-1	4	2716-12-3	5(a)(2)
872-50-4	4	2837-89-0	5(a)(2)
930-37-0	4	2897-60-1	4
933-75-5	4	3072-84-2	4
1129-42-6	5(a)(2)	3083-25-8	5(a)(2)
1163-19-5	4	3089-19-8	5(a)(2)
1241-94-7	4	3101-60-8	4
1309-64-4	4	3132-64-7	5(a)(2)
1330-78-5	4	3165-93-3	5(a)(2)
1332-21-4	6	3188-83-8	4
1336-36-3	6	3194-55-6	4
1345-04-6	4	3288-58-2	4
1464-53-5	4	3319-31-1	4
1511-62-2	5(a)(2)	3389-71-7	5(a)(2)

CAS Registry <u>Number</u>	Regulated Under TSCA <u>Section(s)</u>	CAS Registry <u>Number</u>	Regulated Under TSCA <u>Section(s)</u>
3568-29-4	4	15827-56-2	5(a)(2)
3618-72-2	4	15965-99-8	4
3648-20-2	4	16245-77-5	4
3689-24-5	4	16245-97-9	4
3772-94-9	4	16532-79-9	4
4016-11-9	4	17557-23-2	4
4016-14-2	4	17963-04-1	4
4162-45-2	4	18241-31-1	5(e)
4170-30-3	4	19201-36-6	5(a)(2)
4694-91-1	5(a)(2)	19721-22-3	5(a)(2)
5026-74-4	4	20166-73-8	5(a)(2)
5216-25-1	4	20217-01-0	4
5255-75-4	4	20830-81-3	4
5344-82-1	4	21160-95-2	5(a)(2)
5493-45-8	4	21807-69-2	5(a)(2)
5958-25-8	5(a)(2)	21850-44-2	4
6178-32-1	4	22421-59-6	4
6196-98-1	5(a)(2)	25155-23-1	4
6304-39-8	5(a)(2)	25327-89-3	4
6422-86-2	4	25550-98-5	4
6752-33-6	5(a)(2)	26447-14-3	4
7027-11-4	5(a)(2)	26761-45-5	4
7195-45-1	4	26967-76-0	4
7328-97-4	4	27193-86-8	4
7422-52-8	4	27554-26-3	4
7440-36-0	4	27610-48-6	5(e)
7665-72-7	4	27753-52-2	5(a)(2)
7779-31-9	5(a)(2)	27858-07-7	5(a)(2)
7789-99-3	5(a)(2)	27970-79-2	5(e)
7803-55-6	4	28108-99-8	4
9030-09-5	5(a)(2)	28109-00-4	4
10333-53-6	5(a)(2)	28554-31-6	5(a)(2)
10588-01-9	6	29091-20-1	5(a)(2)
12027-96-2	5(a)(2)	29305-12-2	5(a)(2)
12036-37-2	5(a)(2)	29570-58-9	5(a)(2)
12056-51-8	5(a)(2)	29761-21-5	4
13236-02-7	4	30486-37-4	5(a)(2)
13561-08-5	4	32534-81-9	4
13654-09-6	5(a)(2)	32536-52-0	4
14228-73-0	4	32568-89-1	4

CAS Registry Number	Regulated Under TSCA Section(s)	CAS Registry Number	Regulated Under TSCA Section(s)
34415-31-1	5(a)(2)	68515-50-4	4
34621-99-3	5(a)(2)	68515-51-5	4
35243-89-1	4	68517-02-2	4
36355-01-8	5(a)(2)	68609-96-1	4
37853-59-1	4	68609-97-2	4
37853-61-5	4	68959-23-9	4
38304-52-8	4	68987-80-4	4
38954-75-5	4	69155-42-6	4
41137-60-4	5(a)(2)	70693-06-0	4
41240-76-0	5(a)(2)	71033-08-4	4
42404-50-2	5(a)(2)	71526-07-3	5(a)(2)
42594-17-2	5(a)(2)	71808-64-5	4
47758-37-2	5(a)(2)	72319-24-5	4
51160-97-5	5(a)(2)	74398-71-3	4
52277-33-5	5(a)(2)	75150-13-9	4
52495-71-3	5(a)(2)	75405-06-0	5(a)(2)
54208-63-8	4	75980-60-8	5(a)(2)
54398-08-2	5(a)(2)	79771-08-7	5(a)(2)
54423-67-5	5(a)(2)	79771-09-8	5(a)(2)
55205-38-4	4	80584-91-4	5(f)/6(a)
56803-37-3	4	80584-92-5	5(f)/6(a)
58965-66-5	5(e)	81517-07-9	5(e)
59789-51-4	5(a)(2)	84268-08-6	5(a)(2)
60466-61-7	5(a)(2)	84583-67-5	5(e)
60501-41-9	4	84583-77-7	5(e)
61167-58-6	5(a)(2)	84852-15-3	4
61167-60-0	5(a)(2)	85029-61-4	5(a)(2)
61578-04-9	4	85137-09-3	5(a)(2)
62435-71-6	5(e)	85204-21-3	5(f)/6(a)
65652-41-7	4	85412-54-0	5(a)(2)
65992-66-7	5(a)(2)	85712-26-1	5(a)(2)
67786-03-2	4	85712-27-2	5(a)(2)
68081-84-5	4	86178-38-3	5(a)(2)
68134-06-5	4	87320-05-6	5(a)(2)
68134-07-6	4	87676-07-1	5(a)(2)
68490-66-4	5(a)(2)	89800-10-2	5(a)(2)
68515-42-4	4	90884-29-0	5(a)(2)
68515-47-9	4	92484-07-6	5(a)(2)
68515-48-0	4	93589-69-6	5(a)(2)
68515-49-1	4	94108-97-1	5(a)(2)

[illegible]

<u>Accession Number</u>	<u>Regulated Under TSCA Section(s)</u>	<u>Accession Number</u>	<u>Regulated Under TSCA Section(s)</u>
41259	5(a)(2)	73484	5(a)(2)
42741	5(a)(2)	73542	5(a)(2)
43313	5(a)(2)	73906	5(e)
43993	5(a)(2)	73939	5(a)(2)
44292	5(a)(2)	75015	5(a)(2)
45002	5(a)(2)	76972	5(a)(2)
49435	5(a)(2)	77511	5(a)(2)
49457	5(a)(2)	77668	5(a)(2)
50567	5(a)(2)	77759	5(a)(2)
52381	5(a)(2)	77873	5(a)(2)
52676	5(a)(2)	77997	5(a)(2)
53215	5(a)(2)	78581	5(a)(2)
53862	5(a)(2)	79164	5(a)(2)
55904	5(a)(2)	79926	5(a)(2)
56236	5(a)(2)	80376	5(a)(2)
57397	5(a)(2)	80912	5(a)(2)
58834	5(a)(2)	81426	5(a)(2)
59531	5(a)(2)	82952	5(a)(2)
59622	5(a)(2)	84083	5(e)
60425	5(a)(2)	84801	5(a)(2)
60787	5(a)(2)	85166	5(a)(2)
62283	5(a)(2)	87560	5(a)(2)
62625	5(a)(2)	87968	5(a)(2)
62705	5(f)/6(a)	88472	5(a)(2)
64621	5(a)(2)	89748	5(a)(2)
65328	5(a)(2)	94076	5(a)(2)
65599	5(a)(2)	96378	5(a)(2)
66116	5(a)(2)	100608	5(a)(2)
66387	5(a)(2)	101510	5(a)(2)
66503	5(a)(2)	101601	5(a)(2)
66616	5(a)(2)	101974	5(a)(2)
66898	5(e)	101985	5(a)(2)
67993	5(a)(2)	102057	5(a)(2)
68101	5(a)(2)	102422	5(e)
68145	5(a)(2)	102966	5(a)(2)
68474	5(a)(2)	103094	5(e)
71546	5(a)(2)	103378	5(a)(2)
72414	5(a)(2)	103798	5(a)(2)
72550	5(a)(2)	105090	5(a)(2)
72721	5(a)(2)	105249	5(e)

<u>Accession Number</u>	<u>Regulated Under TSCA Section(s)</u>	<u>Accession Number</u>	<u>Regulated Under TSCA Section(s)</u>
105578	5(a)(2)	123401	5(a)(2)
106720	5(a)(2)	123650	5(a)(2)
106877	5(a)(2)	123785	5(a)(2)
107450	5(a)(2)	123898	5(a)(2)
108260	5(a)(2)	123912	5(a)(2)
108635	5(a)(2)	124540	5(a)(2)
108737	5(e)	124595	5(a)(2)
108851	5(a)(2)	124722	5(a)(2)
109525	5(a)(2)	125292	5(a)(2)
110828	5(a)(2)	125792	5(a)(2)
111423	5(a)(2)	125883	5(a)(2)
112233	5(a)(2)	126002	5(a)(2)
112277	5(a)(2)	126615	5(a)(2)
112380	5(a)(2)	126784	5(a)(2)
112766	5(a)(2)	127992	5(a)(2)
113236	5(a)(2)	128155	5(a)(2)
113372	5(a)(2)	128520	5(a)(2)
113736	5(a)(2)	129147	5(a)(2)
114024	5(a)(2)	129487	5(a)(2)
115209	5(a)(2)	129750	5(a)(2)
115538	5(a)(2)	129829	5(a)(2)
115981	5(a)(2)	130291	5(e)
116439	5(a)(2)	130428	5(a)(2)
116531	5(e)	131125	5(a)(2)
116917	5(e)	131943	5(a)(2)
117090	5(a)(2)	132537	5(a)(2)
118526	5(a)(2)	132651	5(e)
119450	5(a)(2)	132811	5(a)(2)
119585	5(a)(2)	133201	5(a)(2)
120208	5(a)(2)	133256	5(a)(2)
120866	5(a)(2)	133336	5(a)(2)
121585	5(a)(2)	134077	5(a)(2)
121621	5(a)(2)	136722	5(a)(2)
121972	5(a)(2)	137361	5(a)(2)
122395	5(a)(2)	138217	5(a)(2)
122464	5(a)(2)	140502	5(a)(2)
122704	5(a)(2)	143636	5(a)(2)
122908	5(a)(2)	144231	5(a)(2)
123116	5(a)(2)	149872	5(e)
123296	5(a)(2)	149907	5(a)(2)

<u>Accession Number</u>	<u>Regulated Under TSCA Section(s)</u>	<u>Accession Number</u>	<u>Regulated Under TSCA Section(s)</u>
151032 5(a)(2)		
151690 5(a)(2)		
154473 5(e)		
156424 5(a)(2)		
156526 5(a)(2)		
158715 5(a)(2)		
159003 5(a)(2)		
166768 5(a)(2)		
167227 5(a)(2)		
167910 5(a)(2)		
168822 5(a)(2)		
168935 5(a)(2)		
170059 5(a)(2)		
170219 5(a)(2)		
171063 5(a)(2)		
173014 5(a)(2)		
173296 5(a)(2)		
173310 5(a)(2)		
173343 5(a)(2)		
174324 5(a)(2)		
174722 5(a)(2)		
176875 5(a)(2)		
178097 5(a)(2)		
179090 5(a)(2)		
179578 5(a)(2)		

Appendix B

Instructions for Submitting IUR Reports on Magnetic Media

EPA is encouraging all 1994 IUR submitters to file their IUR reports in an electronically readable format. Magnetic media submissions are preferred because handling and archiving are more efficient and there is less likelihood of transcription error than with paper copies.

These instructions are furnished for two purposes: to allow companies to determine whether they are able to comply with the general instructions for magnetic media submissions, and to provide the responsible computer professionals the technical specifications they need to actually prepare the IUR electronic reports.

GENERAL INSTRUCTIONS

An electronic IUR submission is produced by a plant site or company mailing to EPA two flat ASCII files which report the appropriate production information from each plant site. All such submissions must be on diskette. Instructions in this appendix describe who can report by such files, how to prepare the reporting packet, specifications for the preparation of the files, and a detailed description of their contents. Finally, instructions for mailing the submission are included.

Minimal Magnetic Media Reporting Restrictions in 1994

In the 1986 reporting cycle, no form U's containing chemicals with claims for confidentiality could be submitted via magnetic media; however, this restriction is no longer valid. Magnetic Form U reports may include chemicals with claims for confidentiality; a report with a variety of confidentiality claims on one submission is also acceptable.

There is also no longer a minimum or maximum number of chemicals to qualify for electronic reporting; any number is acceptable. However, there is a maximum of 999 chemicals from one plant site.

There are only two magnetic media restrictions remaining:

- 1) Importers who are unaware of the chemical identity of the substance which they are importing must report via hard copy; no magnetic media reporting is permitted. In this case, the foreign supplier must have a hard copy of the Form U to provide the identity information to the EPA.
- 2) Any chemical with production volume exceeding 999,999,999,999 lbs. must be reported on hard copy.

No magnetic tapes will be accepted in this reporting cycle. Only diskettes can be processed in 1994.

Hard Copy Form Still Required

Persons who file via magnetic media are still required to fill in the top portion of the hard copy Form U report with the certification statement and signature, technical contact and company name, and plant site information in accordance with subsection IV.D.2. (page 23) of the instruction manual. Any accompanying information, e.g., substantiation claim for CBI claims on chemical ID or Form C's for Inventory corrections, would also be attached as hard copy pages. Only the chemical substance identity/activity/production volume/confidentiality information can be furnished on the magnetic media.

Note also that no corrections for any previously submitted reporting may be made on magnetic media, for 1994 or any earlier reporting cycle. Corrections must always be provided to EPA as hard copy.

TECHNICAL INFORMATION

Types of Acceptable Media

In this cycle, magnetic tapes will not be accepted. Only ASCII diskette submissions from IBM and compatible personal computers are permissible. The person preparing the submission should check file contents via the TYPE command in DOS to ensure that the files are in ASCII format.

DISKETTE SUBMISSION TECHNICAL SPECIFICATIONS:

DOS formatted: 2.3 or higher
Double Density or High Density
3.5" or 5.25" diskette dimensions
ASCII text only (no word processing, data bases, or spread sheet files in native format)

One Form U Number per Site

The Form U number on the top right of the form uniquely identifies the plant site. For 1994 reporting, the EPA will assign Form U numbers starting from 61100000. Numbers lower than 61100000 are unacceptable for 1994 reports.

Each plant site must use a different Form U number. All plant sites must submit a minimum of one hard copy Form U with the top portion filled out. Every line

of the electronic file(s) will contain the Form U number which corresponds to the top of the Form U filled out for that site.

A single Form U will generally suffice for any single plant site if magnetic reporting is anticipated for every substance. This differs from hard copy reporting, where only ten chemicals are reportable per form. There is an upper limit of 999 chemicals from one site, corresponding to one Form U number, if a diskette is used to convey the chemical information. For example, plant site A could report on 135 chemicals using one Form U number and filling out only the top portion of only one Form U. In the unlikely event that more than 999 chemicals are reportable from one plant site, a second Form U will be required.

Data File Formats

For each plant site, two ASCII data files will be prepared. The first data file is a chemical name file (N is the record type and the first character in each line). The second data file is a submitter production file (D is the record type and the first character in each line). These files together will correspond to the chemical identification/activity/confidentiality block of the Form U (Blocks A. through H.).

The chemical name file and the submitter production file must be submitted as two separate files, rather than as alternating records in one consolidated file.

The file format layouts for reporting are in Exhibits B-1 and B-2. There should be no deviations from these file formats. Use the designated constants and do not use any delimiters. Where blanks or spaces are acceptable, be sure to maintain the specified column positions by spacing over to the desired starting point.

Samples of valid electronic reporting are provided in Exhibit B-3. The first field in each file consists of the record type, either D or N, followed by a two digit number denoting the number of record occurrences for the substance (always "00" for the D file, see N file layout for more information on this number in the N file). Next is the Form U number for the site, followed by a "line" number. The line numbers start with '001' and each substance is assigned a sequential line number by the submitter. For example, in a valid submitter production file the first six lines might begin with these characters in the first fourteen columns:

```
D0061100012001...
D0061100012002...
D0061100012003...
D0061100012004...
D0061100012005...
D0061100012006...
```

There can be up to 999 lines, e.g., chemicals, reported per one plant site using one Form U number.

Submitters should not mix reporting from several sites in one file. Each site should submit two ASCII files, one for chemical names and one for submitter production data. Both of the files will start with identical digits in the columns 4 - 14. Both of the files will have the same number of lines (except where chemical names are very long. See below for additional details on handling long names).

Companies may, however, submit the pairs of plant site files from multiple plant sites on one diskette, e.g., Company A might submit a single diskette with twenty four files, which consist of twelve chemical name files and twelve submitter production files, corresponding to twelve plant sites.

File Naming Conventions

Submitters should name diskette files using the Form U number, e.g. for Company A's plant site in Hometown, KY, the chemical name file might be 61100012.NAM and the submitter production file might be 61100012.SUB. Use of this convention will provide consistency.

Exhibit B-1
Chemical Name File Format

Field Name	Column Start	Column End	Type	Definition/Requirements
1. Record Type	1	1	CH	Constant value of "N" to indicate that the record contains a chemical name. Mandatory.
2. Sequence Number	2	3	NU	Refers to the number of 135 byte segments for the chemical name. Values range from "01" to "99". The first segment would be "01", the second segment of the chemical name would be "02", etc. Mandatory.
3. Form Number	4	11	CH	Left justified. Corresponds to the Form U number on the submitter production file and the Form U for the plant site. Mandatory.
4. Line Number	12	14	NU	Right justified; zero filled. Corresponds to the line number on the submitter production file. (Exhibit b-2) Mandatory. Example: "003".
5. Chemical Name	15	149	CH	135 byte segments of the chemical name for the substance being reported. Mandatory.

End of Chemical Name Record Layout.

NU = Numeric; CH = Alphanumeric Character

Chemical Name File Instructions (File N)

There is only one record format in this file. No blanks or spaces, other than those in the chemical name or at the end of the chemical name, will be included.

Each record begins with the upper case "N" character in column 1 (field #1 = Record Type).

The sequence number in columns 2 3 (field # 2 = Sequence Number) is always right justified and zero filled, e.g. 01, 02. For names shorter than 135 bytes, the sequence number will always be "01" and the Form U and line number combination (fields # 3 and 4) will occur only once per file.

If the chemical name (field # 5 = Chemical Name) is longer than 135 bytes, the sequence number in columns 2 - 3 will reflect the multiple occurrence, as follows. In this case, the Form U and line number combination (fields # 3 - 4, or cols. 4 - 14) may occur more than once per file.

Example of a long chemical name record for Form U 61100012, line 005:

First segment of the chemical name will start with
N0161100012005Methyl... (sequence number of "01")

Second segment of the chemical name for the same substance will begin with
N0261100012005benzyl... (sequence number of "02")

The line number in columns 12 14 (field #4 = Line Number) is always right justified and zero filled, e.g., "005".

Exhibit B-2
Submitter Production File Format

Field Name	Column Start	Column End	Type	Definition/Requirements
1. Record Type	1	1	CH	Constant value of "D" to indicate that the record contains submitter production data, such as chemical identification numbers, activity, production volumes, and CBI claims. Mandatory.
2. Sequence Number	2	3	NU	Sequence number for a "D" record type is always "00". Mandatory.
3. Form Number	4	11	CH	Left justified. Corresponds to Form U number on plant site form. Mandatory.
4. Line Number	12	14	NU	Right justified; zero filled. Each substance is assigned a unique line number. Allowed values from "001" through "999". Mandatory.
5. CAS Registry Number	15	23	NU	Right justified; zero filled. Example: 000050000. Blank if unknown.
6. EPA Accession Number	24	32	NU	Right justified; zero filled. Example: 000055555. Blank if not used.
7. Original Inventory Number	33	40	NU	Right justified; zero filled. Only to be used if neither field 5 or 6 is filled in. Corresponds to form A, B, C or E. Example: 33000001. Blank if not used.
8. Original Inventory Line Number	41	43	NU	Right justified; zero filled. Values from "001" to "999". Only to be used if field 7 is also filled in. If form C was used for reporting, this field always contains "001". Blank if not used.
9. PMN Number	44	51	NU	Left justified; no hyphens. Format is PYYNNNNA, where P is a constant, YY indicates year, NNNN is a four digit zero filled sequence number and A is an optional suffix. Example: P860023. Blank if not used.
10. Bona Fide Number	52	60	NU	Left justified; no hyphens. Format is 52YYNNNNN, where "52" is a constant, YY indicates year, and NNNNN is a five digit sequence number. Example: 528800011. Blank if not used.
11. TMEA Number	61	68	CH	Left justified; no hyphens. Format is TYNNNNNA, where T is a constant, YY indicates year, NNNN is a four digit zero filled sequence number and A is an optional suffix. Example: T850023B. Blank if not used.

Field Name	Column Start	Column End	Type	Definition/Requirements
12. Activity	69	69	CH	"M" for Manufacture, or "I" for Import. Create a second line if a chemical is both manufactured and imported at same plant site. Mandatory.
13. CBI Activity	70	70	CH	"Y" for YES, or "N" for NO to indicate a CBI claim for the activity. Mandatory.
14. Site Limited	71	71	CH	"X" if the chemical is consumed in entirety on site, BLANK if not. Mandatory.
15. CBI Site Limited	72	72	CH	"Y" for YES, or "N" for NO to indicate a CBI claim for the SITE LIMITED status in filed #14. Mandatory.
16. CBI Plant Site	73	73	CH	"Y" for YES, or "N" for NO to indicate a CBI claim for the PLANT SITE name and address. Mandatory.
17. Production Volume	74	85	NU	Right justified, with leading zeros, no commas or decimals. Report volume in pounds. No scientific notation. Mandatory.
18. CBI Production Volume	86	86	CH	"Y" for YES, or "N" for NO to indicate a CBI claim for the PRODUCTION VOLUME value in field 17. Mandatory.
19. CBI Chemical Identity	87	87	CH	"Y" for YES, or "N" for NO to indicate a CBI claim for the chemical identity, which is a combination of the identifier and the chemical name. Mandatory.

End of Submitter Production Record Layout.

NU = Numeric; CH = Alphanumeric Character

Submitter Production File Instructions (File D)

There is only one record format in this file. Each record begins with an upper case "D" in column 1 (Field #1 = Record Type), followed by the constant "00" in columns 2 3 (Field #2 = Sequence Number). Fields #1 through #4 ("D00" or Record type/Sequence number, Form U number, Form U 'line') are mandatory on each line. The same Form U number (Field #3) and Line number (Field #4) combination can occur only once per file.

In reporting a chemical identifier in fields #5 through #11 or columns 15 - 68, several options are available. The submitter is expected to fill out only one chemical identifier (either field #5, #6, #7 and #8, #9, #10 or #11) and leave the remaining fields blank. See Section III.C.5.b. and c. (page 16) of the manual for guidance.

Other than within the chemical identifier area (fields #5 - 11, columns 15 - 68), blanks or spaces are acceptable only in the column for Site Limited (field #14; col. 71). All numeric values must be zero filled and right justified. All alphabetic characters must be upper case. Entries in fields #12, #13 and #15 through #19, columns 69 - 70 and 72 - 87, are mandatory; no blanks or spaces are allowed.

Exhibit 3: Example of Valid IUR Diskette Reporting Files

PRODUCTION FILE 61100012.SUB: (Column Positions specified for ease in interpretation)

[illegible]

File Begins Here:

D0061100012001000050000

D0061100012002010010670

D0061100012003000050011

D0061100012004000050011

D0061100012005000067641

D0061100012006 000105553

D0061100012007028118107

MN NN000000333000NN

MNXYN000000033000YN

MN NN000987444000NN

IN NN000008008888NN

MN NN000000123435NN

IY NN000088770000YY

MN NN000004440000NN

CHEMICAL NAME FILE 61100012.NAM: (Column Positions specified for ease in interpretation)

[illegible]

File Begins Here:

N0161100012001Formaldehyde

N01611000120021, 4-Piperazinediethanesulfonic acid, monosodium salt

N0161100012003Guanidine, monohydrochloride

N01611000120042-Propanone

N01611000120052-Propanone

N0161100012006Naphthalene, 1,3,5-trisubstituted, alkali salt

N01611000120071H-Benzimidazolium, 5,6-dichloro-2-[3-(5,6-dichloro-1,3-diethyl-1,3-dihydro-2H-benzimi...2-

N0261100012007ylidene) -1-propenyl-]-1-ethyl-3-...

MAILING INSTRUCTIONS

If the diskette contains CBI, it should be physically labeled indicating that it "Contains TSCA CBI". It should be identified with the company name and, if appropriate, the plant site. Read-only tab protection should be applied. If more than one diskette is submitted by a company, the labels should also indicate the number and the total number, e.g., disk 1 of 2, disk 2 of 2.

Diskettes should be placed in a durable mailing container, as damaged diskettes will be returned to the submitter without further attempt by EPA to recover data. It is advisable to send a backup diskette, in case of damage to the primary diskette.

All feasible precautions in mailing magnetic media containing CBI should be adopted by the submitter for its protection, such as double wrapped envelopes, registered mail, etc., just as one would apply to the hard copy submission. The signed Form U should also be included in the same mailing packet.

Cover letters accompanying any magnetic media submission should refer to the CBI status of the submissions, and should list plant site, Form U numbers and the corresponding file names. Number of records (chemicals) per file may also be specified. A technical contact name for data processing matters, if different from the contact on the form, should be identified in the cover letter.

Questions about the magnetic media submission instructions should be addressed to:

TSCA Hotline
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (7408)
401 M Street, S.W.
Washington, DC 20460
Attn: Inventory Update Rule
Telephone: (202) 554-1404