

**2020 EPA CDR
Primary Form U**



U.S. Environmental Protection Agency
Washington, DC 20460
Chemical Data Reporting
Site Report
(Section 8(a) Toxic Substances Control
Act, 15 U.S.C. 2607(a))

Included in this submission:	
Original submission	
Revised submission	
Manufacturer	
Joint submission(s) - as primary submitter	
Co-Manufacturer submission(s) - as contracting	X
Co-Manufacturer submission(s) - as producing	

Submission Date:		Revised Date:	
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CDR Certification

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

TSCA CBI Certification

I certify that all claims for confidentiality asserted with this submission are true and correct, and all information submitted herein to substantiate such claims is true and correct. Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. 1001. I further certify that:

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

Signature of Authorized Official		Name (printed)	
Date Signed		Email Address	

Submitting Official Information

Name of Authorized Official		CBI:	
Company Name		Position	
Email Address		Phone Number	
Mailing Address 1			
Mailing Address 2			
City		State	
Postal Code		Country	

Part I. COMPANY & SITE IDENTIFICATION INFORMATION			
Section A.1 Domestic Parent Company Information			
Company Name		Company Type	Domestic Parent Company
Dun & Bradstreet Number			
Mailing Address 1			
Mailing Address 2		City	
State		County/Parish	
Postal Code		Country	US
Section A.2 Foreign Company Information			
Foreign Company Name		Company Type	Foreign Company
Foreign Company Dun & Bradstreet Number			
Foreign Company Address			
Foreign Company Address 2		Foreign City	
Foreign State/Province/Other		Foreign County/Parish	
Foreign Postal Code	~	Foreign Country	
Section B. Site Information			
EPA Registry ID		Program ID	
Site Name		Dun & Bradstreet Number	
Site Address			
Site Address 2		City	
State		County/Parish	
Postal Code		Country	
North American Industry Classification System (NAICS) Code(s)			
NAICS Code	Activity Classification		
111120 Oilseed (Except Soybean) Farming	Import		
111333 Strawberry Farming	Manufacture		
111130 Dry Pea And Bean Farming	Both		

Part II. CHEMICAL SUBSTANCE INFORMATION

Section A. Chemical Substance Identification

Chemical Name		Chemical Identifying Number	
Number ID Code		Chemical Alias	

Section A.1 Confidential Business Information related to this chemical identity

Company Information Confidential:	Site Information Confidential:	Technical Contact Information Confidential:
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When Chemical Identifying Number is ACCNO one of the following statements displays:

- I wish to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the confidential portion of the TSCA Inventory.
- I do not wish to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the confidential portion of the TSCA Inventory.

Section B. Technical Contact Information

Contact Name		Company Name	
Phone Number		Email Address	
Mailing Address 1		Mailing Address 2	
City		State	
Postal Code		Country	

Section C. Manufacturing Information

Non-Principal Reporting Year(s) Production Volume Information

CBI

Calendar Year 2018		
Calendar Year 2017		
Calendar Year 2016		

Section C.2 Co-manufacturer: Contracting Company

Report CY 2019 Production Volume and Co-manufacturer Information

CBI

CBI

Check if you wish to report the joint relationship as confidential:

Chemical Name/Alias			
CY2019 Contracted Production Volume		Volume Contracted Never Physically At Site	
Producing Company Name		Producing Company Email	
Producing Company Address		Producing Company Address 2	
Producing Company City/Town		Producing Company State/Province/Other	
Producing Company Zip Code		Producing Company Country	

Section D. Processing and Use Information

Section D.1 Industrial Processing and Use

Process and Use Information		CBI		CBI
Type of Process or Use		Sector(s)		
Function Category		Percent Production Volume		
Number of Sites		Number of Workers		

Section D.2 Consumer and Commercial Use

Product Category Information		CBI		CBI
Product Category		Function Category		
Consumer or Commercial		Used in Products Intended for Children		
Percent Production Volume		Maximum Concentration		
Number of Commercial Workers Reasonably Likely to be Exposed				

Part III. CONFIDENTIAL BUSINESS INFORMATION SUBSTANTIATION

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

Substantiation Questions applicable to Chemical Identity	Yes	No	CBI
<p>1. Is this chemical substance publicly known (including by your competitors) to be in U.S. commerce? If yes, please explain why the specific chemical identity should still be afforded confidential status (e.g., the chemical is publicly known only as being distributed in commerce for research and development purposes). If no, please complete the certification statement: I certify that on the date referenced, I searched the internet for the chemical substance identity (i.e., by both chemical substance name and CASRN). I did not find a reference to this chemical substance which would indicate the chemical is being manufactured or imported by anyone for a commercial purpose in the United States.</p> <p>Explanation:</p> <p>Date:</p>			
<p>2. Does this particular chemical substance leave the site of manufacture (including import) in any form, e.g., as a product, effluent, emission? If yes, please explain what measures have been taken to guard against the discovery of its identity.</p> <p>Explanation:</p>			
<p>3. If the chemical substance leaves the site in a form that is available to the public or your competitors, can the chemical identity be readily discovered by analysis of the substance (e.g., product, effluent, emission), in light of existing technologies and any costs, difficulties, or limitations associated with such technologies? Please explain why or why not.</p> <p>Explanation:</p>			
<p>4. Would disclosure of the specific chemical name release confidential process information? If yes, please explain.</p> <p>Explanation:</p>			

Substantiation Questions applicable to all Confidential Business Information	Yes	No	CBI
<p>1. Will disclosure of the information claimed as confidential likely cause substantial harm to your business's competitive position? If you answered yes, describe the substantial harmful effects that would likely result to your competitive position if the information is disclosed, including how a competitor could use such information and the causal relationship between the disclosure and the harmful effects.</p>			

Explanation:			
2. To the extent your business has disclosed the information to others (both internally and externally), has your business taken precautions to protect the confidentiality of the disclosed information? If yes, please explain and identify the specific measures or internal controls your business has taken to protect the information claimed as confidential.			
Explanation:			
3.A. Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.			
Explanation:			
3.B. Does any of the information claimed as confidential otherwise appear in any public documents, including (but not limited to) safety data sheets, advertising or promotional material, professional or trade publications, state, local, or Federal agency files, or any other media or publications available to the general public? If yes, please explain why the information should be treated as confidential.			
Explanation:			
3.C. Does any of the information claimed as confidential appear in a patent or patent application? If yes, please provide the associated patent number and explain why the information should be treated as confidential.			
Explanation:			
4. Does any of the information you are claiming as confidential constitute a trade secret? If yes, please explain how the information you are claiming as confidential constitutes a trade secret.			
Explanation:			
5. Is the claim of confidentiality intended to last less than 10 years (see TSCA section 14(e)(1)(B))? If yes, please indicate the number of years (between 1–10 years) or the specific date after which the claim is withdrawn.			
Explanation:			
6. Has EPA, another federal agency, or court made any confidentiality determination regarding information associated with this chemical substance? If yes, please provide the circumstances associated with the prior determination, whether the information was found to be entitled to confidential treatment, the entity that made the decision, and the date of the determination.			
Explanation:			

Paperwork Reduction Act Notice

The annual public burden for this collection of information, which is approved under OMB Control Number 2070-0162, varies depending on the submitter's experience with CDR reporting, and is estimated to average 131.12 hours per year for the average multi-chemical submission of 7.5 chemicals per site with 22% of reports consisting of partial reports and 15% of sites as new reporters. A full report includes manufacturing, processing, and use information. A partial report includes manufacturing information and does not include processing and use information. This estimate includes time spent on rule familiarization (for new reporters), compliance determination, form completion, and recordkeeping. This estimate also includes combined effects of increases to certain reporting activities (incremental rule familiarization and compliance determination, data elements on Form U) as well as the elimination of reporting for newly exempted chemical reports and/or sites from the CDR Revisions Final Rule. Burden is defined in 5 CFR 1320.3(b). In addition, for Central Data Exchange (CDX) activities the average per-response burden is estimated at 0.53 hours per registration for those respondents not already registered in CDX. Burden is defined in 5 CFR 1320.3(b). According to the Paperwork Reduction Act, "burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For this collection it includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information; and disclosing or providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number. The OMB control number for this collection appears above. In addition, the OMB control numbers for EPA's regulations, after initial display in the final rule, are listed in 40 CFR part 9. Exp. Exp 4/30/2022.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden (including the use of automated collection techniques) to: Director, Collection Strategies Division, U.S. Environmental Protection Agency (Mail Code 2822), 1200 Pennsylvania Ave, N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence, but do not submit the completed form to this address. The requested information should be submitted in accordance with the instructions accompanying the form, or as specified in the corresponding regulation.