



eIUR Software
Integrated Help Files

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Electronic Reporting Tool for the 2006 IUR (eIUR): Introduction and Getting Started

Introduction

Welcome to the electronic reporting software for the 2006 Inventory Update Reporting (IUR). With eIUR, you will have a fast, efficient, user-friendly mechanism with which to enter, save, encrypt, validate, and submit your 2006 IUR data.

Highlights of eIUR include:

- Easy navigation with an **IUR Form Navigator**.
- Drop down menus for quick retrieval of relevant information and codes.
- Embedded, linked help.
- The ability to submit data on multiple chemicals associated with one site.
- The ability to easily duplicate relevant chemical information using the 'clone chemical' feature.

This software allows you to submit your 2006 IUR data in an electronic format, which will assist the Environmental Protection Agency (EPA) in the collection, processing, and storage of IUR data and will help the Agency increase its overall efficiency by reducing mistakes associated with tasks such as key-entry and by greatly reducing the time needed to review and input your submission.

Key Information

eIUR allows you to generate, save, and submit your 2006 IUR data to EPA. Four key characteristics of this software deserve special emphasis:

1) Three submission options. This software allows you to submit your 2006 IUR data in one of three ways:

- Through the internet, by uploading an electronic file and sending it to EPA via the Agency's Central Data Exchange (CDX) interface.
- On electronic media, by mailing the completed electronic (encrypted XML) file to EPA on diskette or CD.
- On hardcopy, by printing and mailing a completed, printed Form U to EPA.

It is important to use only ONE submission approach. Thus, should you choose to upload your file to CDX, you should NOT also mail the electronic file or a paper copy to EPA.

EPA strongly encourages the submittal of electronic data (mailing the encrypted file on disk to EPA or uploading and sending the file through CDX). This will greatly streamline the processing of your IUR data.

2) Multiple chemicals per form. You can submit information on an unlimited number of chemicals associated with one site in a single submission – limited only by your computer's processing speed and memory. You cannot submit information on multiple chemicals from multiple sites within a single IUR XML file. However, you can generate multiple XML files, one for each site.

3) Corrections and other IUR documents. This tool is to be used for the submission of original 2006 IUR data only. Other IUR documents -- such as IUR Form Corrections -- must be mailed to EPA in hardcopy format.

4) Joint submitters. This tool does not accommodate joint submitters. If you need to jointly submit 2006 IUR data, you will need to mail a hardcopy (paper) submission to EPA. You can still use this software for data entry.

Overview of the Standard eIUR Interface

Figure 1 shows a standard eIUR window. The major components of the eIUR software include the following:

Title Bar – located at the top of the interface indicating that eIUR is open for use. In Figure 1, the Title Bar says: **eIUR – [Unsaved]**.

Menu and Tool Bars – located below the title bar. Available menu options include: **File, Edit, Tools, and Help**. Below the **Menu Bar** are several icons that allow you to perform actions quickly.

IUR Form Navigator – located on the left side of the screen. This navigator lists the specific sections of your IUR form and adjusts as you add or delete chemicals. From the navigator, you can quickly navigate to any specific section of the software. Note: data need not be entered in any particular order; the **IUR Form Navigator** allows you to complete any section of the form in the order in which you choose.

IUR Data Entry Screen - the right side of the window will contain the different screens developed for entering IUR data. The data entry screen shown in Figure 1 is titled: **Part 1 – SITE IDENTIFICATION INFORMATION**. All data entry screens in this tool correspond to the physical IUR submission form. Also, note that all data fields contain a unique block number. These block numbers correspond to the block numbers on the physical IUR Form U.

Back and Next Arrows - located in the top right hand corner of the screen. These provide another mechanism for navigating to different data entry screens.

Tasks Window – located in the top left of the screen; above the **IUR Form Navigator** pane. At any given time, there are a number of menu options that are available to you. Most of these options can also be accessed through the **Tool and Menu Bars**.

Help Icon – located on the top right hand corner and identifiable as a question mark in a bubble (?). This icon is used to obtain additional help while using this software. Help files have been generated for each data entry screen. When selected, help panels will appear on the right hand side of the user interface and will provide instructions and helpful hints.

In all sections of eIUR, all data fields must be completed except for those bracketed with the symbols “<>.” The data fields so marked are optional. In addition, if a field value is not known, you must enter “NRO” for “Not Readily Obtainable.”

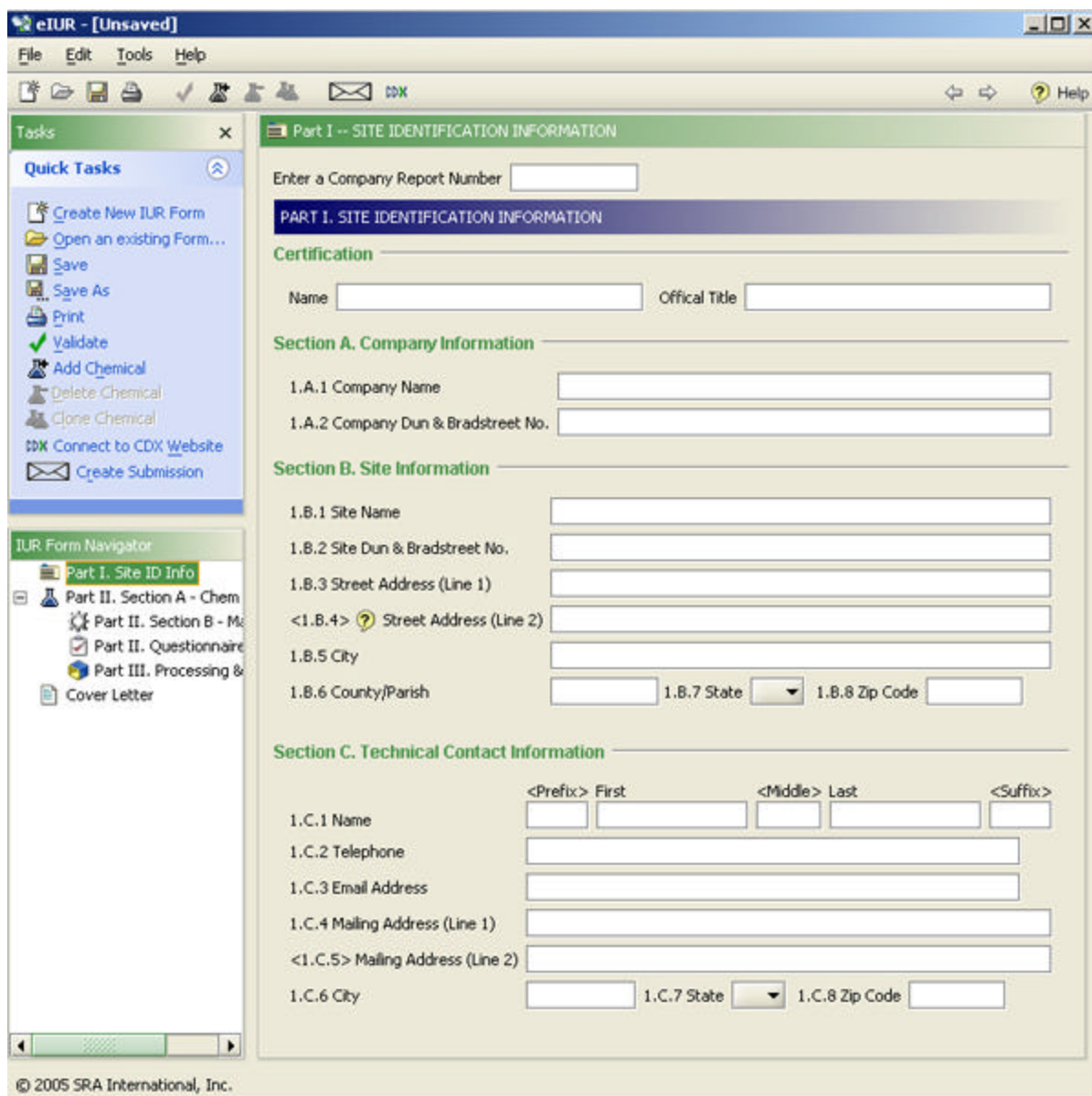


Figure 1 - Standard eIUR Interface

Creating a New IUR Form

1. Launch eIUR by clicking on the eIUR icon from your desktop (or wherever you place eIUR during installation).
2. Choose **Create a New IUR Form** from the **Quick Tasks** menu or by choosing **File/Create New IUR Form**. You may also select the **Create New Form Icon** (📁*) from the **Tool Bar**. Any one of these options will create the Form U structure within the **IUR Form Navigator** (left pane on your screen). Data fields corresponding to Page 1 of the paper Form U will appear in the right hand window and will then be ready for data entry.

Add, Delete, and Clone Chemicals

1. If you plan to submit information on more than one chemical, select **Add Chemical** from the **Edit** menu on the **Title Bar** or click on the **Add Chemical Icon** (🧪) on the **Tool Bar**.

When this icon is selected, the data entry screen associated with chemical information is opened and available for data entry. The **IUR Form Navigator** contains links to the four data entry screens for each chemical. By clicking on the appropriate link, you can access that portion of the form. As seen in Figure 2, the **Add Chemical** feature was used to add a total of two chemicals, Chemical 1 and Chemical 2. The **IUR Form Navigator** shows the four data entry screens (e.g., **Section A, Manufacturing, Questionnaire, and Processing and Use**) that were replicated for each chemical.

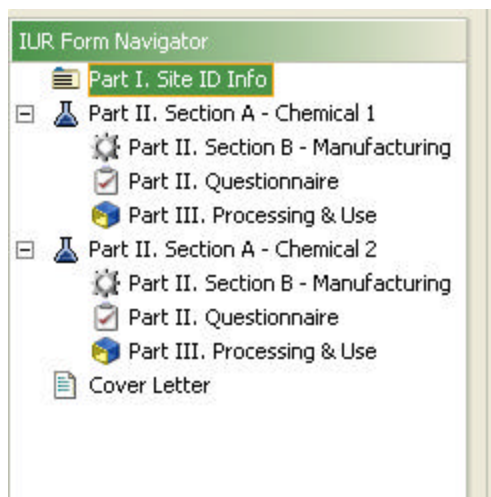


Figure 2 - IUR Form Navigator with Multiple Chemicals

2. To delete a chemical, click on the name of the chemical within the **IUR Form Navigator** and either click on the **Delete Chemical Icon** (🗑️) on the **Tool Bar** or use **Edit/Delete Chemical**.
3. If you are reporting similar information on multiple chemicals, you can use the **Clone Chemical Icon** (📄) to copy the information already entered for one specific chemical to screens for a different chemical. To do so, enter information for the first chemical. Then, either click the icon (📄) or click on **Edit/Clone Chemical**. All entered information will be duplicated as the same chemical name in the **IUR Form Navigator** (left pane). Next, in the **IUR Form Navigator**, click on the “cloned” chemical data entry screens and edit as necessary.

Open an Existing Form


1. Launch eIUR by clicking on the eIUR icon from your desktop (or wherever you have chosen to place eIUR during installation).
2. Choose **Open an Existing Form** from the **Quick Tasks Menu** or by clicking on **File/Open**. You may also click on the **Open Existing Form Icon** (📁) from the **Tool Bar**.
3. Navigate to the location where you saved the IUR data you now wish to retrieve. IUR data is saved with an .xml file extension. See Figure 3.
NOTE: the “...” button is the Browse button for this software. Clicking on this button will allow you to browse your computer files to locate the file you wish to upload.
4. Once you have selected the file name, click **OK**. The eIUR software will load your existing IUR XML data file. It is then available for edit.



Figure 3 - Open Existing IUR Form Screen

Saving Data

It is very important that you save your data periodically while using this software; you can do so at any time. To save your data, complete the following steps.

1. Click on the Save Icon () on your **Tool Bar** or click on **File/Save**. The software will automatically run validation to ensure data entered thus far passes certain formatting checks and is consistent with IUR business rules. If the file failed validation, a warning message will appear. See Figure 4.

You can choose to save your data regardless of validation. However, the file **MUST** pass validation in order for it to be submitted to EPA. To save the file, click **Yes**.

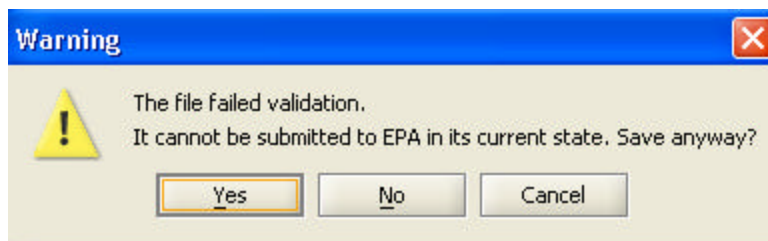


Figure 4 - Warning Dialog Box

2. After clicking on **Yes**, a dialog box will appear confirming that your file has been saved. See Figure 5. Click **OK**.

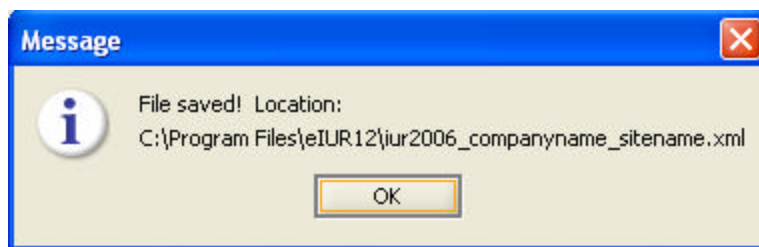


Figure 5 - File Saved Dialog Box

Note: the default naming convention for saving IUR data via this software is the following: **jur2006_companynome_sitename.xml**; where “companynome” is the company name entered in **Block 1.A.1** and “sitename” is the site name entered in **Block 1.B.1**.

EPA requests that you maintain this default naming convention for saving and submitting 2006 IUR data.

Validating Data

Once you have completed entering data into eIUR, you **MUST** validate your data before you submit the information to EPA. To validate your data, complete the following steps:

1) With your file completed, click on the **Validate Icon** (✓) on the **Tool Bar** or go to **Tools/Validate**. Validation will run and, once completed, a **Validation Results** Panel will appear at the bottom of your screen indicating the number and type of violations that have been found in your data, if any. See Figure 6.



Figure 6 - Validation Results Panel

2) For each problem detected, a violation statement will appear in the **Validation Results** window. Violation statements consist of the following:

- a. Name of the Data Entry Screen where the error occurs (i.e. **Site Identification Information**)
- b. Name of the field which has an error (i.e. field: Company Name)
- c. Current value of the field; what is currently populating the field
- d. A short description of the problem with the field; (e.g., no value, incorrect format, etc.)

To move to the data entry screen containing the error, double click on the specific violation statement in the **Validation Results** window.

3) Once you correct all errors and run the validation routine again, the **Validation Results** window will indicate that no errors were found. Note that all errors must be corrected before the submission can pass validation, and before the file can be sent to EPA.

Submitting the IUR Form

As noted above, there are three options for submitting the completed form:

- Through the Internet, by uploading an electronic file to EPA via CDX.
- On electronic media, by mailing the completed electronic (encrypted XML) file to EPA on diskette or CD.
- On hardcopy, by mailing a completed, printed, and signed Form U to EPA.

In order to provide the maximum amount of protection possible, EPA has built file encryption directly into this software. File encryption is mandatory for anyone submitting electronically either via CDX or mail. Encryption is provided as a means of assuring submitters that their data is protected when being provided to EPA in an electronic format. The utilized encryption algorithm is fully compliant with FIPS 140-2. Only EPA has the private key necessary to decrypt the file and access the data.

Each submission option is detailed below. Submit your data to EPA using only one method. EPA suggests that you use one of the two electronic methods for submitting your data. Also, validate and correct any identified errors prior to submitting your IUR 2006 data to EPA.

Submission Option 1: Submitting via the Internet using CDX

For the 2006 IUR, you will be able to submit an encrypted electronic XML file generated by eIUR via the Agency's CDX. CDX enables fast, efficient and more accurate environmental data submissions to EPA and participating program offices.

To submit your IUR data using CDX, you must **first** register with CDX and generate a **CDX User ID** and **CDX Password**. Your **CDX User ID** and **CDX Password** are required to both electronically sign your Form U and to upload your encrypted file. The process for obtaining a **CDX User ID** and **CDX Password** can take several days, so please register with CDX several weeks in advance of the date you plan to submit your file. To create a **CDX User ID** and **CDX Password**, follow the CDX registration instructions at: <http://cdx.epa.gov>.

Once you have obtained your **CDX User ID** and **CDX Password**, and you have entered and validated your data in this software, you are ready to submit your data to EPA via CDX. Before doing so, **please be sure to save a copy of the XML file prior to encryption. Once the file is encrypted, it can only be decrypted by authorized EPA personnel.** Note that you may request a readable copy of your electronic submission for a period of 5 years after submission by contacting the IUR Submission Coordinator.

To submit your data using CDX, follow these steps:

1. Click the **Submission Icon** on the **Tool Bar** (✉). Once you select the **Submission Icon**, your file will be checked automatically for validation errors. If errors are found, you must review and correct each error before the file can be submitted. If no errors are found, the following screen will appear:

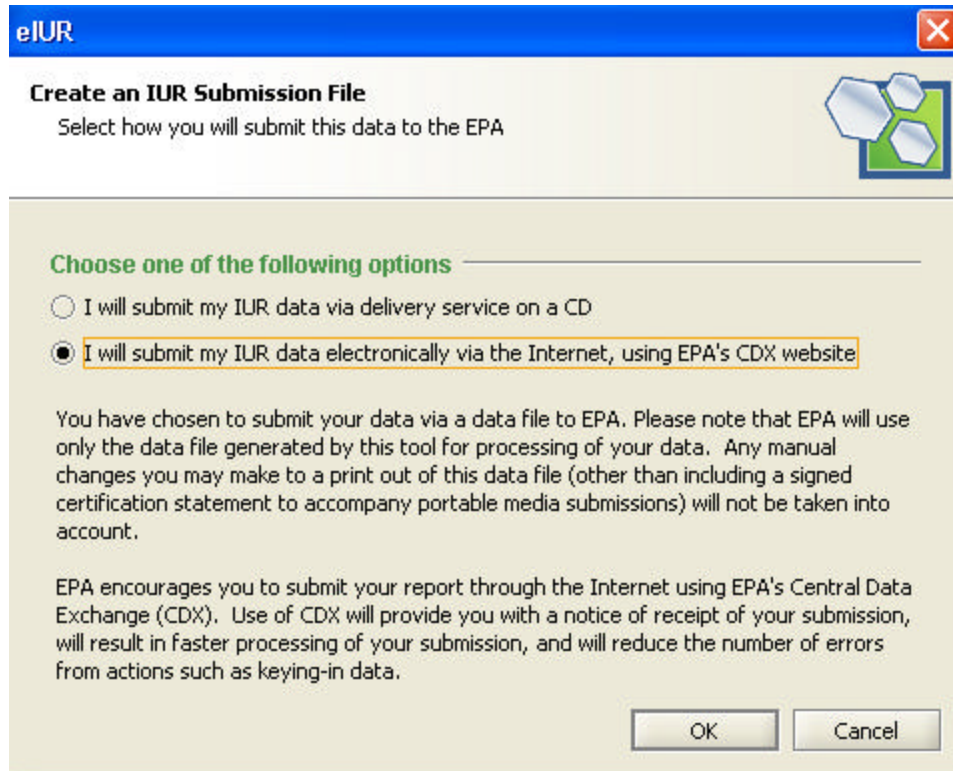


Figure 7 - CDX Submission Screen

2. Click on the second option: **I will submit my IUR data electronically via the Internet, using EPA's CDX website**. Select **OK**. A message will appear reminding you of the need to register with CDX prior to uploading your file. See Figure 8.

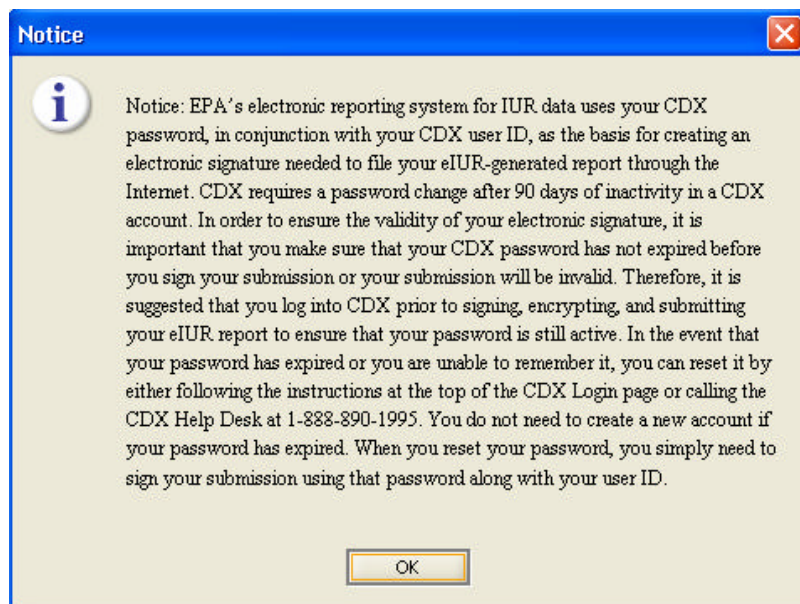


Figure 8 - CDX Message

3. If you have your **CDX User ID** and **CDX Password**, click **OK**. You will be prompted for your User ID and Password for you to “sign” the file. See Figure 9.

NOTE: By inserting your **CDX User ID** and **CDX Password**, a submitter is certifying to the content and accuracy of the data submitted. This “signature” carries the same weight as the traditional “wet ink” signature used for submitting past IUR data.

IUR Cryptographic Services
Create an electronic signature for certification

Certification

Name: Official Title:

Date: (format: mm/dd/yyyy)

Electronic Signature

"I hereby certify to the best of my knowledge and belief that Parts I and II have been completed in compliance with the requirements of 40 CFR 710.52(c)(1), (2), and (3); Part III of this form has been completed in compliance with the requirements of 40 CFR 710.52(c)(4); and any confidentiality claims are true and correct as to that information for which they have been asserted."

CDX User ID: CDX Password:

Confirm User ID: Confirm Password:

Copy of Record Statement

I understand that I have the opportunity to request a readable copy of any electronic submission for a period of 5 years after submission by contacting the IUR Submission Coordinator by mail at the following address or by email at IUR.RDMB@epa.gov:

Hand Delivery or Courier:	US Postal Service:
IUR Submissions Coordinator	IUR Submission Coordinator (7407M)
US Environmental Protection Agency	US Environmental Protection Agency
Office of Pollution Prevention and Toxics	Office of Pollution Prevention and Toxics
EPA East Building	Ariel Rios Building
Room 6428	1200 Pennsylvania Avenue, NW
1201 Constitution Avenue, NW	Washington, DC 20460
Washington DC 20004-3302	

I acknowledge reading the above statement

OK Cancel

Figure 9 - CDX Submission Certification

4. The certifying Official's Name and Title, as entered at the top of the **Site Identification Information** screen, will be pre-populated in this window, as will the current date. Read the **Electronic Signature** statement and enter your valid **CDX User ID** and **CDX Password** in the space provided. Click **OK**.
5. Click that you have acknowledged reading the **Copy of Record Statement**, which allows you to request a readable copy of the electronic submission for a period of 5 years after submitting your data to EPA.
6. After you have signed with your **CDX User ID** and **CDX Password**, the software will automatically generate an encrypted version of the file. Once the file is encrypted, it can only be unencrypted by authorized EPA personnel. It is this encrypted file that you will upload to CDX. The following window will appear after you electronically "sign" the file (See Figure 10):



Figure 10 - Encryption Window


Note that this window identifies a location for the encrypted IUR file and provides a default name of: **iur2006_company name_site name.xml.enc** where “companyname” is the company name entered in **Block 1.A.1** and “sitename” is the site name entered in **Block 1.B.1**.

7. Click **OK**. An encrypted file save confirmation message will appear. See Figure 11.



Figure 11 - Encryption Save Confirmation

Please maintain this file name and note the folder or directory where you place the file. Once the file is encrypted, it can only be decrypted by authorized EPA personnel. As such, please be sure to save a copy of the XML file prior to encryption so that you can access your data for your purposes.

- Click **OK**. You are now ready to submit your encrypted IUR 2006 data file via the CDX website. To do so, either click on the **CDX** icon () located on the **Tool Bar** or close eIUR and access the CDX website at <http://cdx.epa.gov>. Follow the instructions for uploading IUR files provided on the website. Remember to submit the encrypted version (.enc file).

Submission Option 2: Submitting via Mailing or Delivering an Encrypted Electronic File to EPA

Submitting your 2006 IUR data by mailing or delivering electronic media containing your encrypted XML file to EPA follows much of the same procedure as the CDX process described previously. Instead of uploading the file via CDX, you will be copying the encrypted file to either a diskette or CD (depending of the file size) and mailing or otherwise delivering it to EPA. All applicable instructions are listed below.

With your data entry complete and validated, you are ready to submit your electronic file to EPA via US Mail or other delivery service. **Please be sure to save a copy of the XML file prior to encryption so that you can access your data for your purposes. Once the file is encrypted, it can only be decrypted by authorized EPA personnel.**

To submit your data on a CD or disk, follow these steps:

- Click the **Submission Icon** on the **Tool Bar** () . The following screen will appear (see Figure 12):

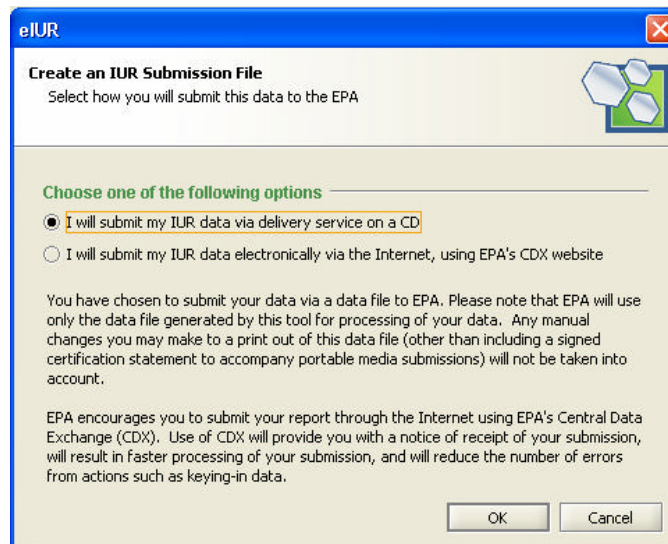


Figure 12 - Electronic File Submission

2. Click on the first option: **I will submit my IUR data via delivery service on a CD or disk** and select **OK**. The encryption utility will load automatically and the following window will appear (see Figure 13):



Figure 13 - Electronic File Encryption Window

Note that this screen will prompt you to enter a location on your computer to save the encrypted file and will provide a default name of: **iur2006_company name_sitename.xml.enc** where “companyname” is the company name entered in **Block 1.A.1** and “sitename” is the site name entered in **Block 1.B.1**. Click **OK** after you made your selections.

3. Once saved, a confirmation message will appear (See Figure 14). Select **OK** to continue.



Figure 14 - Encryption Save Confirmation

Please maintain this file name and note which folder or directory you place the file in. Once the file is encrypted, it can only be decrypted by authorized EPA personnel. As such, please be sure to save a copy of the XML file prior to encryption so that you can access your data for your purposes.

4. eIUR will display a message signaling that it is ready to print the certification page to PDF (see Figure 15). Click **OK** and the certification page will be saved to your hard drive as a PDF file. Be sure to note the location of the saved file. You may launch the page immediately if you have a PDF viewer installed or launch it at a later time. To view and print this page, you must have Adobe Acrobat Reader loaded on your computer. If you need to download Adobe Reader, it is available free of charge at: www.adobe.com.

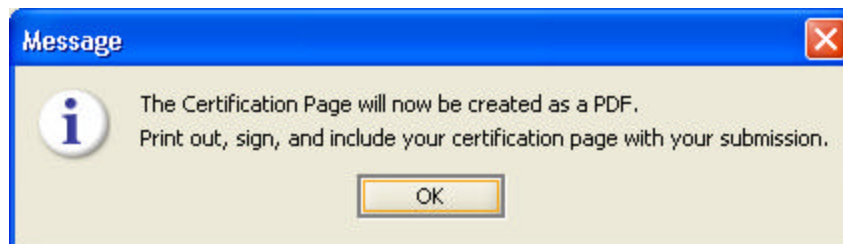


Figure 15 - Certification Page Message

5. After printing the **Certification Page**, have the appropriate official complete and sign the page.

You are now ready to submit your encrypted IUR 2006 data file via the U.S. mail or equivalent. To do so, copy the encrypted file (make sure the filename ends in “.enc”) to either a 3.5” diskette or CD, place it in an envelope along with the hardcopy signed certification statement, and send or deliver it to:

Submissions sent via the U.S. Postal Service:

IUR Submissions Coordinator (7407M)
U. S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Submissions sent by Courier or Hand Delivery

IUR Submissions Coordinator
U.S. EPA - OPPT
EPA East Building
Room 6428
1201 Constitution Ave., N.W.
Washington, DC

Note that if your submission contains Confidential Business Information (CBI), it must be labeled indicating that it “Contains TSCA CBI”. Media should also be identified with the company name and, if applicable, the site. If more than one diskette/CD-ROM is submitted by a company, the labels should also indicate the disk/CD-ROM number and the total number (e.g., disk 1 of 2, disk 2 of 2).

All feasible precautions should be taken in mailing magnetic media to EPA. The media should be placed in a durable mailing container to protect its integrity. The mailing container should be double wrapped and shipped by registered mail or a private delivery agency. A signed paper copy of the certification statement should be included in the package with the magnetic media. If included, a cover letter should refer to the following: the CBI status of the submission; the person submitting the report and the site for which the report is submitted; the number of chemicals included in the report; and, a technical contact for data processing matters.

Submission Option 3: Submitting a Hardcopy 2006 IUR Form to EPA

If you prefer to submit your 2006 IUR data via a hardcopy paper submission, please follow these steps.

1. Complete data entry in eIUR.
2. Validate and save your data.
3. From the **Menu Bar**, click on **File/Print**. The following screen will appear (see Figure 16):

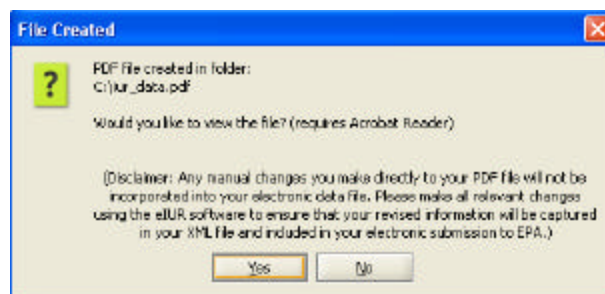





Figure 16 - Print File Created Screen

4. The print function will generate a PDF of the IUR data that parallels the paper IUR form. To view this file, you must have Adobe Acrobat Reader loaded on your computer. If you already have Adobe Reader loaded, the PDF will be launched. If you need to download Adobe Reader, it is available free of charge at: www.adobe.com.
5. Have the appropriate official complete and sign the top of the first page of the Form U; labeled **Certification**.
6. Mail your completed, signed hardcopy 2006 IUR Form U – including the cover letter (if applicable), signed certification, and all substantiation questions and answers (if applicable) to the address listed in submission option 2.

Remember that if your submission contains CBI, you must follow EPA’s CBI mailing requirements found in the 2006 IUR Instruction manual. Protect the report by double-wrapping the submission. If the report contains CBI, label the inner package with the notation “Contains Confidential Business Information.” You may wish to use registered mail or a courier to submit your report.

Site Identification Information Screen

This screen allows you to enter data corresponding to **Part I: Site Identification Information**, found on page 1 of the hardcopy Form U. The following paragraphs describe the information that should be entered into each of the data element blocks.

Note that data can be saved at any time by clicking on the **Save Icon** () on the **Tool Bar**. In addition, you can navigate to different sections of the form by using the forward and back arrows ( ) located in the top right corner of the screen, or using the **IUR Form Navigator** in the bottom left section of the screen.

Company Report Number

A **Company Report Number** is an eight-digit alphanumeric number that you should assign to your IUR Form U to uniquely identify each specific submission. A sample number is: A1B2C3D4.

This number will be used during the electronic submission process to uniquely identify your submission, ensuring that you have a way to identify your specific submission prior to receiving your acknowledgement letter listing the corresponding EPA-assigned Form U number. In the event that you submit multiple electronic copies of Form U, please ensure that you use a unique company report number for each submission.

Note that a company report number is needed for all electronic submissions, regardless of whether or not the submission was sent to EPA using the Internet (via CDX) or by mail or other delivery service (on a disk).

Name and Official Title (Certification)

Enter the name and title of the person who will sign the certification statement. Note that this person must be an authorized official of your company.

Company Name (Block 1.A.1)

Enter the full name of the company. Include any add-on terms such as Inc., Ltd., L.L.C., etc.

Company Dun & Bradstreet Number (Block 1.A.2)

Dun & Bradstreet assigns separate numbers to subsidiaries and parent companies; please make sure that the number you provide EPA in this block belongs to the company for which you are reporting. If the company does not have a Dun & Bradstreet number, you can request one from your local office of Dun & Bradstreet. There is no charge for this service and you are not required to disclose sensitive financial information to get a number.

For more information on obtaining a Dun & Bradstreet number, see www.dnb.com/us. If you are

already listed with Dun & Bradstreet, but do not know your number, you can call 1-888-814-1435 for assistance.

Plant Site Name (Block 1.B.1)

Enter the full name of the site. Include any add-on terms such as Inc., Ltd., L.L.C., etc. In some cases, this information may be the same as that reported in **Block 1.A.1**.

Note: The site for a chemical substance importer is the site of the operating unit within the importer's organization that is directly responsible for importing the substance and that controls the import transaction. In some cases, it may be the organization's headquarters in the United States.

Plant Site Dun & Bradstreet Number (Block 1.B.2)

Dun & Bradstreet gives separate numbers to subsidiaries and parent companies; make sure that the number you provide EPA in this block belongs to the individual site for which you are reporting. If the site does not have a Dun & Bradstreet number, you can request one from your local office of Dun & Bradstreet. There is no charge for this service and you are not required to disclose sensitive financial information to get a number.

For more information on obtaining a Dun & Bradstreet number, see www.dnb.com/us. If you are already listed with Dun & Bradstreet, but do not know your number, you can call 1-888-814-1435 for assistance.

Site Street Address (Blocks 1.B.3 through 1.B.8)

Enter your site mailing address, including the appropriate county or parish, using standard addressing techniques as established by the US Postal Service. Post office box numbers are acceptable only if accompanied by a street address. If a post office box is listed, it should be listed after the street address in **Block 1.B.4 (Address Line 2)**. If your site is located in a state or territory that is not subdivided into counties, parishes, or similar jurisdictional units, enter "N/A" in the box for County/Parish, for "not applicable."

Technical Contact Name (Block 1.C.1)

Enter the name of the person whom EPA may contact for clarification of 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 United States. Also, the technical contact need not be the person who signed the certification statement.

Technical Contact Telephone Number and Email Address (Blocks 1.C.2 and 1.C.3)

Enter the technical contact's telephone number, including the area code, and his or her email address.




Technical Contact Mailing Address (Blocks 1.C.4 through 1.C.8)

Enter the technical contact's mailing address, using standard addressing techniques as established by the U.S. Postal Service. Post office box numbers are acceptable only if accompanied by a street address. If a post office box is listed, it should be listed after the street address in **Block 1.C.5**.

Once you have completed this screen, use the forward and back arrows (↩️➡️) located in the top right corner of the page, or the **IUR Form Navigator** (left pane), to navigate to other portions of the form.

Part II - Section A. Chemical Identification Screen

This screen allows you to enter the information about your chemical that corresponds to information required for **Part II – Section A: Chemical Identification Information**, located at the top of page 2 of the hardcopy Form U. The IUR rule requires manufacturers (including importers) to report both the specific chemical substance name and the Chemical Abstract Service (CAS) Registry Number (or other identifying number) of each reportable chemical substance manufactured (including imported) in amounts of 25,000 or more pounds per year. The following paragraphs describe the information that should be entered into each of the data element blocks.

Note that data can be saved at any time by clicking on the **Save Icon** () on the **Tool Bar**. In addition, users can navigate to different sections of the form by using the forward and back arrows ( ) located in the top right corner of the screen, or using the **IUR Form Navigator** in the bottom left section of the screen.

Information in this part of Form U must be reported to the extent that it is known to or reasonably ascertainable by the submitting company. Known to or reasonably ascertainable by means all information in a person's possession or control, plus all information that a reasonable person similarly situated might be expected to possess, control, or know.

Under Toxic Substances Control Act (TSCA) section 8(a), the Agency may collect information associated with chemical substances to the extent that it is known to or reasonably ascertainable by the submitter. This is information possessed by employees or other agents of the company reporting under the IUR regulation including persons involved in the research, development, manufacturing, or marketing of a chemical substance. This information includes knowledge gained through discussions, symposia, and technical publications.

Examples of types of information that are considered to be in a person's possession or control, or that a reasonable person similarly situated might be expected to possess, control, or know are:

- Files maintained by the submitter or employees in the submitter's company;
- Information contained in standard references, such as Material Safety Data Sheets (MSDSs), that contain use information or concentrations of chemicals in mixtures; and
- Information from CAS, Dun and Bradstreet, and the North American Industry Classification System (NAICS).

Claiming Chemical Identity Confidential

You may claim the identity of a substance as confidential by checking the CBI box – listed as: **“Click to mark this section CBI”** at the top of this section. Note that to claim the identity of your substance as confidential, it must not be listed on the public portion TSCA Inventory of Chemical Substances (TSCA Inventory). EPA will not honor a chemical identity CBI claim for a substance that is listed on the non-confidential public portion of the TSCA Inventory.

In order to claim your chemical identity as confidential, you are required to substantiate your claim. Once you select the CBI box, the **Chemical ID CBI Substantiation questionnaire** will launch. You need to answer all eleven questions in this questionnaire for chemical CBI claims to be considered. See Figure 17.

The screenshot shows the eJur software interface. The main window is titled 'eJur - [Unsaved]'. The left sidebar shows a navigation tree with 'PART II. MANUFACTURING INFORMATION' selected. The main content area is titled 'PART II. MANUFACTURING INFORMATION' and contains 'Section A. Chemical Identification'. A checkbox labeled 'Click to mark this section CBI' is checked. Below this are three input fields: '2.A.1 Chemical Identifying Number' (with a 'CAS Registry Lookup' button), '2.A.2 ID Code' (with a dropdown arrow), and '2.A.3 Chemical Name' (with a text area). Below these is a section for '<Chemical Alias>' with a text area. The 'Chemical ID CBI Substantiation' section contains four numbered questions with corresponding text areas for answers:

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 part? How could a competitor use such information? Would the effects of disclosure be substantial? What is the causal relationship between the disclosure and the harmful effects?
2. How long should confidential treatment be given—by 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?

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Figure 17 - Substantiation Questions

Also, note that checking the CBI 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. See **Section B of Part II** to claim company or plant site information as confidential.

Chemical Identifying Number (Block 2.A.1)

CAS Registry and Other Identifying Numbers

Every chemical substance reported on Form U must be accompanied by its CAS Registry Number (entered into **Block 2.A.1 of Part II**). If the CAS Registry Number is not known or reasonably ascertainable, you may report either an EPA Accession Number for confidential substances or a premanufacture notice (PMN) case number.

Each chemical has a unique Registry Number assigned by the Chemical Abstracts Service (CASRN). For most chemicals on the public portion of the TSCA Inventory, the CASRN may be found by using the search function in the chemical identification section, **Part II, Section A**, of the eIUR software. Note that if the correct CASRN is not listed in the software, your substance may still be on the public portion of the TSCA Inventory under another name or may be on the confidential portion of the TSCA Inventory. Do not assume that if a substance is not listed in the eIUR software, it is not reportable under IUR.

Please note that some chemical substances included in the CAS Registry Lookup Tool will have more than one CAS Registry Number linked to them. This is due to CAS Registry Numbers being replaced or updated by CAS. When you perform a search, a result box with three columns will open up. The first column (CAS Number) will contain the CAS Registry Number being searched. The second column (Replaced with) will show the most up to date CAS Registry Number for this entry if a newer one exists, or will be empty if the CAS Registry Number you searched is the most up to date CAS Registry Number. If a CAS Registry Number does appear on the second column, please make sure to use this number when filling your form as this is the correct number to use for TSCA reporting purposes. The third column (CAS Name) will provide the chemical name for your entry.

A typical CAS Registry Number contains a set of numbers separated by a dash from a 2-digit number which is, in turn, separated by a dash from a single-digit number.

EPA Accession Number

If the identity of a chemical substance in the TSCA Inventory is confidential, the public portion of the Inventory lists an Accession Number for that substance and uses a generic name rather than a specific identity. Note that you may be reporting for the wrong substance if you find a generic chemical identity in the public portion of the TSCA Inventory that you think belongs to your substance and report using the Accession Number for that substance. A typical Accession Number is a 5 or 6-digit number such as “265497.”

PMN Number

If you filed a PMN for a substance that is now reportable under the IUR and were assigned a PMN number, you can use that as an identifying number, when the CASRN is not known or reasonably ascertainable. A typical PMN number looks like this: “P850243” or “P830001A.”

Please be aware that a chemical substance that has a PMN number is not automatically reportable under the IUR. A PMN substance is reportable under the IUR only if it is included in the TSCA Inventory as a result of EPA’s receipt of a Notice of Commencement for the substance.

ID Code (Block 2.A.2)

Enter the code specifying the type of identifying number you entered in **Block 2.A.1**. You can choose one of the following three options from the drop down menu. Options include:

- Accession Number
- CAS Registry Number
- PMN Number

Chemical Name (Block 2.A.3)

Enter the specific name of the chemical substance you are reporting in **Block 2.A.3**. Use Chemical Abstracts Index/Preferred names if available. You can find names of non-confidential substances in the public portion of the TSCA Inventory. If such names are not available, use nomenclature that completely and accurately describes the chemical substance.

If you are an importer whose foreign supplier will not reveal to you the identity of the substance you are reporting, you must submit your Form U using the hard-copy or paper form. See the “Instructions for Reporting.”

After you have entered a chemical name, it will appear as the identifier for this screen in the **IUR Form Navigator** (left pane). For example, if you are submitting information on a chemical named “Chemical X” as entered into **Block 2.A.3**, the chemical name will appear in the **IUR Form Navigator**. See Figure 18.

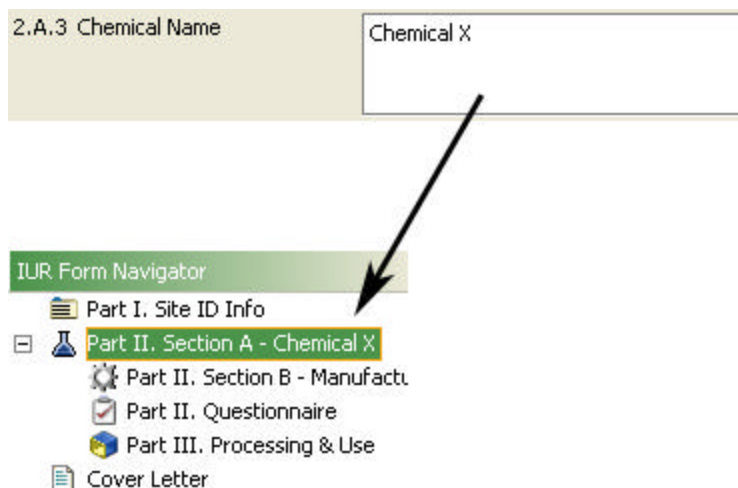


Figure 18 - IUR Form Navigator with Chemical Name Field

Chemical Alias

A **Chemical Alias** field has been provided to further facilitate navigation in the eIUR software. While you must enter a **Chemical Name (Block 2.A.3)**, a **Chemical Alias** is completely optional and will be used only to assist submitter navigation of this tool; EPA will not use the alias in any way.

If you provide a chemical alias in the **Chemical Alias** field, it will be used as the identifier in the **IUR Form Navigator** (left pane).

Figure 19 shows use of the data entered into the **Chemical Alias** field (“Alias 1”) for navigation within the **IUR Form Navigator**.

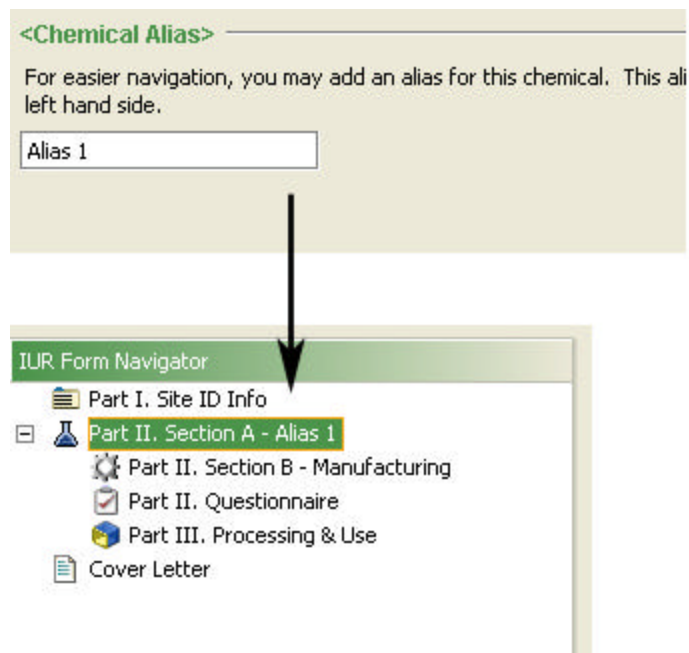


Figure 19 - IUR Form Navigator and Chemical Alias Field

Once you have completed this screen, use the forward and back arrows (↔) on the top right corner of the page, or the **IUR Form Navigator** (left pane), to navigate to other portions of the eIUR software.

Part II - Section B. Manufacturing Information Screen

This screen allows the user to enter data pertaining to **Part II – Section B** of the Form U. This section permits you to describe the manufacturing information for each chemical substance.

Information in this part of Form U must be reported to the extent that it is known to or reasonably ascertainable by the submitting company. Known to or reasonably ascertainable by means all information in a person's possession or control, plus all information that a reasonable person similarly situated might be expected to possess, control, or know.

Under TSCA section 8(a), the Agency may collect information associated with chemical substances to the extent that it is known to or reasonably ascertainable by the submitter. This is information possessed by employees or other agents of the company reporting under the IUR regulation including persons involved in the research, development, manufacturing, or marketing of a chemical substance. This information includes knowledge gained through discussions, symposia, and technical publications.

Examples of types of information that are considered to be in a person's possession or control, or that a reasonable person similarly situated might be expected to possess, control, or know are:

- Files maintained by the submitter or employees in the submitter's company;
- Information contained in standard references, such as MSDSs, that contain use information or concentrations of chemicals in mixtures; and
- Information from CAS, Dun and Bradstreet, and NAICS.

Company Information (Block 2.B.1)

Checking the **CBI Box** in this block asserts a confidentiality claim for the link between the chemical substance and all of the information reported in **Part I, Section A** of Form U. Part I, Section A contains company identification information. Checking other CBI boxes on the form will not protect this link. You may claim this connection as confidential for some chemical substances for which you are reporting, while not making the claim for others (each chemical substance for which you report will have separate Parts II and III).

Site Information (Block 2.B.2)

Check this **CBI Box** to claim the link between the site of manufacture/import (reported in **Part I, Section B**) and the chemical identity as confidential. You may claim this

connection as confidential for some chemical substances for which you are reporting, while not making the claim for others (each chemical substance for which you report will have separate Parts II and III).

To assert a claim of confidentiality for site information, you are required to substantiate the claim in writing by answering two questions. You must do so each time you claim site information linked to a particular chemical substance as confidential.

Therefore, checking this **CBI Box** will load the two-question **Plant Site Information CBI Substantiation** questionnaire at the bottom of this screen. Both questions must be answered for the site information CBI claim to be substantiated. If you fail to substantiate the site CBI claim in accordance with the applicable regulations, EPA may make the information available to the public without further notice to you.

Technical Contact Information (Block 2.B.3)

Checking the **CBI Box** in this block asserts a confidentiality claim for the link between the chemical substance and the technical contact information reported in **Part I, Section C** of Form U. Checking other CBI boxes on the form will not protect this link. You may claim this connection as confidential for some chemical substances for which you are reporting, while not making the claim for others (each chemical substance for which you report will have a separate Parts II and III).

Site Limited (Y/N) (Block 2.B.4)

If you manufacture the chemical substance at the site identified in **Part I, Section B** of Form U and do not distribute the chemical substance or any mixture or article containing that substance outside the plant site for commercial purposes, select “**Yes**” from the drop down menu next to the **CBI Box**. Otherwise, select “**No**” from the drop down menu.

Note: you cannot report an imported chemical substance as site-limited. You may claim the fact that a substance is or is not site-limited as confidential, as appropriate, by checking the **CBI Box**.

Activity (Manufacture and/or Import) (Block 2.B.5)

Check the box(es) that describe the activities at your site. For the purpose of this data element, *manufacture* means to domestically manufacture or produce for commercial purposes. *Import* means to bring any chemical substance or any chemical substance as part of a mixture or article into the customs territory of the United States.

If you both manufacture and import the same chemical substance, please check both boxes.

Check the **CBI Box** to claim the nature of the activity (i.e., manufacture vs. import) as confidential. Claiming an activity as CBI does not protect the link between your

company and the substance; that link will not be protected unless you check the **CBI Box** associated with the company name.

Manufactured Production Volume (lb) (Block 2.B.6)

Enter the volume of the chemical manufactured domestically at your site during calendar year 2005, in pounds. If you both manufacture and import a particular substance, report only the manufactured volume in this space. **Block 2.B.7** is used to report the imported volume. If you indicated that you only import this chemical, this block will be automatically completed by eIUR.

Report the quantity to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. Production volumes should be reported in numeric format (i.e., 58,000 or 6,352,000) because the Agency's automated equipment cannot read volumes other than those expressed in numeric format. For example, "2 million" or "2 E6" are not acceptable, nor are abbreviations such as M (12,000,000 = 12M) or K (50,000 = 50K). Check the **CBI Box** to claim manufactured production volume as confidential.

Imported Production Volume (lb) (Block 2.B.7)

Enter the volume of chemical imported by your site in 2005, in pounds. If you both manufacture and import a particular substance, just report the imported volume in this space. **Block 2.B.6** is used to report the manufactured volume. If you indicated that you only manufacture this chemical, this block will be automatically completed by eIUR.

Report the quantity to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. Production volumes should be reported in numeric format (i.e., 58,000 or 6,352,000) since the Agency's automated equipment cannot read volumes other than those expressed in numeric format. For example, "2 million" or "2 E6" are not acceptable, nor are abbreviations such as M (12,000,000 = 12M) or K (50,000 = 50K). Check the **CBI Box** to claim imported production volume as confidential.

Number of Workers (Block 2.B.8)

Report the total number of workers reasonably likely to be exposed to each reportable chemical substance at each site during the reporting year (i.e., during 2005). For **Block 2.B.8**, report the code corresponding to the range noted in Table 1 for the number of workers reasonably likely to be exposed to a reportable chemical substance during manufacture. You may do this by selecting the appropriate code from the drop down menu. Check the **CBI Box** to claim the number of workers reported as confidential.

Table 1 - Codes for Reporting Number of Industrial Workers Reasonably Likely to be Exposed

Code	Range of Workers Reasonably Likely to be Exposed
W1	Fewer than 10
W2	At least 10 but fewer than 25
W3	At least 25 but fewer than 50
W4	At least 50 but fewer than 100
W5	At least 100 but fewer than 500
W6	At least 500 but fewer than 1,000
W7	At least 1,000 but fewer than 10,000
W8	10,000 or more

“Reasonably likely to be exposed” means “an exposure to a chemical substance which, under foreseeable conditions of manufacture (including import), processing, distribution in commerce, or use of the chemical substance, is more likely to occur than not to occur. Such exposures would normally include, but would not be limited to, activities such as charging reactor vessels, drumming, bulk loading, cleaning equipment, maintenance operations, materials handling and transfers, and analytical operations. Covered exposures include exposures through any route of entry (inhalation, ingestion, skin contact, absorption, etc.), but excludes accidental or theoretical exposures” (40 CFR 710.43).

Persons reasonably likely to be exposed to a chemical substance include workers whose employment requires them to pass through areas where chemicals are manufactured, processed, or used (e.g., production workers and foremen, process engineers, and plant managers). Workers employed to drive vehicles which transport the chemical should be included in the number of workers reasonably likely to be exposed to the chemical substance if they come into contact with the chemical during loading or unloading. For example, workers engaged in the connection or disengagement of hoses used to load or unload the chemical should be included. However, workers involved solely with transporting chemicals in sealed (totally enclosed with no potential for exposure) containers should not be included.

In addition, when a site employs temporary, seasonal, or contract workers in the manufacture or a reportable chemical substance, these workers should be included in the number of workers reasonably likely to be exposed to a chemical substance if they work in areas where the chemical is manufactured (including imported). The term does not include those employees whose jobs are unassociated with potential exposures to a substance or mixture (e.g., administrative staff who never enter areas where the chemical is manufactured) and who are unlikely to be exposed to a chemical substance even for a brief period of time. No allowance is made for personal protective equipment or for engineering controls that reduce but do not preclude exposure to a chemical substance; however, if contact between a worker and a chemical is highly improbable, the worker should not be included among those persons reasonably likely to be exposed to the chemical substance.

When there is no potential exposure to a chemical substance, the code W1 corresponding to fewer than 10 workers would be reported. This would be the case, for instance, when a chemical is imported in sealed containers and resold without repackaging or is shipped from a foreign source directly to a customer.

Maximum Concentration (Block 2.B.9)

Report the maximum concentration, measured by weight, of your reportable chemical substance at the time it is reacted onsite to produce a different chemical substance or as it leaves the site. The concentration must be accurate to the extent that information is known to or reasonably ascertained by you. In your determination of the maximum concentration, do not include product sent offsite for non-commercial purposes.

For each substance, select the maximum concentration of the substance from the ranges listed in Table 2 . You may select the code from the drop down menu. If the maximum concentration falls between two ranges, round your estimate to the nearest 1 percent using standard rounding procedures.

Report the maximum concentration regardless of the various physical forms in which the chemical may be sent offsite or reacted onsite to produce a different chemical substance. Check the appropriate **CBI Box** to claim the maximum concentration as confidential.

Table 2 - Codes for Reporting Maximum Concentration

Code	Concentration Range (weight percent)
M1	Less than 1% by weight
M2	From 1% to 30% by weight
M3	From 31% to 60% by weight
M4	From 61% to 90% by weight
M5	Greater than 90% by weight

Physical Form and Percentage of Production Volume (Blocks 2.B.10 through 2.B.15)

Report all physical forms of the chemical substance at this time it is reacted or as it leaves your site and the percentage of production volume for each physical form. The six different physical forms are listed at the bottom of the other manufacturing data screen.

Report the percentage of each physical form reacted onsite or sent offsite rounded off to the closest 10 percent. If the substance is sent offsite in more than one physical form, you must report all of the physical forms in which it is sent offsite.

In column “a” of this section, check the box for each physical form that applies to the chemical substance. Check the **CBI Box** to claim the physical form(s) as confidential.

In column “b” of this section, report the percentage of production volume for each physical form reported in section “a.” Check the **CBI Box** to claim the percentage of production volume as confidential.

Note that the sum total of the **Production Volume %** (column B) may total less or more than 100% due to rounding.

Once you have completed this screen, use the forward and back arrows (←→) located on the top right corner of the screen, or the **IUR Form Navigator** (left pane), to navigate to other portions of the eIUR software.

Questionnaire Screen

This screen has been developed to assist you in determining whether or not the information reported in **Part III – Processing and Use Information** must be reported for your chemical.

If the combined quantities entered in items **2.B.6** and **2.B.7** equals or exceeds 300,000 pounds, the questionnaire screen becomes active. If the combined quantity is less than 300,000 pounds, the questionnaire screen remains inactive.

Complete Part III of Form U for reportable chemical substances manufactured (including imported) for commercial purposes in an amount of 300,000 pounds or more, at your site, in calendar year 2005. If you manufactured your chemical substance in an amount less than 300,000 pounds in 2005, you do not need to complete Part III. Exceptions to this rule are described below:

Does your substance qualify for a partial exemption?

This questionnaire is designed to determine if your reportable substance qualifies for a partial exemption. Manufacturers of qualifying substances are not required to complete Part III of Form U for those substances.

Three categories of substances are generally partially exempt:

1. Certain petroleum process streams listed in 40 CFR 710.46(b)(1),
2. Specific chemical substances for which EPA has identified a low current interest in IUR processing and use information related to the chemicals listed in 40 CFR 710.46(b)(2)(iv), and
3. Inorganic chemical substances (40 CFR 710.46(b)(3)).

Finally, please recognize that this questionnaire screen has been developed to assist you in determining whether or not submission of Part III data is required. **Please note that you may choose to provide this data, even if you are exempt from the reporting requirement, by simply completing Part III – Processing and Use Information Data Entry Screens.**

Question 1 – Is this substance the subject of a rule proposed or promulgated under sections 4, 5(a), 5(b)(4), or 6 of TSCA, or is the subject of an order issued under section 5(e) or 5(f) of TSCA, or is the subject of relief that has been granted under a civil action under section 5 or 7 of TSCA?

If your substance is the subject of a rule proposed or promulgated under sections 4, 5(a), 5(b)(4), or 6 of TSCA, or is the subject of an order issued under section 5(e) or 5(f) of TSCA, or is the subject of relief that has been granted under a civil action under section 5 or 7 of TSCA, please choose the “**Yes**” radio button. This means that you cannot be

given a partial exemption for this substance and are required to complete Part III, if you manufacture 300,000 pounds or more of the chemical substance, regardless of the answers to questions 2, 3, or 4.

Please proceed by using the forward arrow icon (➡) or the **IUR Form Navigator** to get to the next data entry screen – **Part III Processing and Use**.

Question 2 – Is this substance inorganic?

For the 2006 reporting cycle, manufacturers and importers of inorganic substances as, defined in 40 CFR 710.46 (b)(3), are exempt from reporting the information requested in Part III of Form U for those substances. Answer **Yes** or **No** to this question, as appropriate.

If you are reporting on an inorganic substance, as defined in 40 CFR 710.46 (b)(3) (**Yes** to this question) and if your substance is not regulated by another TSCA rule (**No** to Question 1) you do NOT need to complete Part III of Form U.

Question 3 – Is this substance listed as a petroleum process stream?

The chemical substances termed “petroleum process streams” for purposes of IUR that are partially exempt from IUR requirements are listed by CAS Registry Number at 40 CFR 710.46(b)(1). Answer **Yes** or **No** to this question, as appropriate.

If you are reporting one of these specific petroleum process streams (**Yes** to this question) and if your substance is not regulated by another TSCA rule (**No** to Question 1), then you do NOT need to complete Part III of Form U.

Question 4 – Is this substance included in the list of partially exempt chemical substances under 40 CFR 710.46(b)(2)?

The specific substances listed at 40 CFR 710.46(b)(2)(iv) are partially exempt from IUR requirements based on EPA’s determination that there is a low current interest in IUR processing and use information related to these chemicals. Manufacturers are exempt from reporting the information requested in Part III of Form U for these chemicals, but must still report information in Parts I and II of Form U.

If you manufacture or import one of these partially exempt chemicals (**Yes** to this question) and if your substance is not regulated by another TSCA rule (**No** to Question 1), you do NOT need to complete Part III of Form U.

Once you have completed this screen, use the forward and back arrows (⬅➡) located on the top right corner of the screen, or the **IUR Form Navigator** (left pane), to navigate to other portions of the eIUR software.

Part III - Processing and Use Information

This screen allows you to enter data about processing and use of your chemical. Two data tabs are provided to allow you to enter **Section A** and **Section B** data, respectively. Section A covers industrial processing and use information. Section B covers commercial and consumer use information.

Note: If you are not required to complete Part III (and chose not to provide this information voluntarily), check the “N/A” box located at the top right-hand corner of both **Section A** and **Section B** tabs. Checking the box is required in order to pass validation.

Information in this part of Form U must be reported only to the extent that it is readily obtainable. Readily obtainable information means information which is known by management and supervisory employees of the submitter company who are responsible for manufacturing, processing, distributing, technical services, and marketing of the reportable chemical substance. Extensive file searches are not required.

SECTION A: Industrial Processing and Use Data Tab (Blocks 3.A.1 through 3.A.10)

In **Section A**, you are required to report for the chemical substance up to 10 unique combinations of the following data elements:

- Process or use code,
- Five-digit NAICS code, and
- Industrial function category (IFC) code.


A processing and use code, NAICS code, and IFC code combination defines a potential exposure scenario for risk-screening and priority-setting purposes.

For each of these unique combinations, you are also required to report the:

- Percentage of production volume,
- Number of sites code, and
- Number of workers code.

If more than 10 unique combinations apply to a chemical substance, you need only report the 10 combinations for the chemical substance that cumulatively represent the largest percentage of production volume, measured by weight.

If any information is not readily obtainable, enter ‘NRO’ for “not readily obtainable” in the box corresponding to that data element.

You can access the codes by clicking on the **Help Icon** () above each column of data, or viewing them in their respective drop down menus; noted by the [...]. A more comprehensive description is provided below.

Type of Process or Use Code

To the extent that it is readily obtainable, report the process or use code, shown in Table 3 that corresponds to the appropriate processing or use operation for the particular combination of NAICS and IFC codes. A processing or use code may be reported more than once if more than one NAICS and/or IFC code applies to the same processing or use operation.

You may select the appropriate processing or use code from the drop down menu or you may enter the appropriate code into the text box. Check the **CBI Box** to claim the process or use code as confidential. Note that if a chemical substance is reacted (i.e, reporting “PC” for the processing code), then the chemical substance is consumed and further processing and use information for that chemical substance will not exist.

Table 3 - Codes Corresponding to Processing or Use Operations

Code	Operation
PC	Processing as a reactant
PF	Processing—incorporation into formulation, mixture, or reaction product
PA	Processing—incorporation into article
PK	Processing—repackaging
U	Use—non-incorporative activities

Descriptions of these codes are presented below:

1. PC - Chemical substance is used in chemical reactions for the manufacturing of another chemical substance or product.
2. PF - Chemical substance is added to a product (or product mixture) prior to further distribution of the product.
3. PA - Chemical substance becomes an integral component of an article distributed for industrial, trade, or consumer use.
4. PK - Preparation of a chemical substance for distribution in commerce in a different form, state, or quantity. This includes transferring the substance from a bulk container into smaller containers. This definition does not apply to sites that only relabel or redistribute the reportable chemical substance without removing the chemical substance from the container in which it is received or purchased.
5. U - Chemical substance is otherwise used (e.g., as a chemical processing or manufacturing aid).

You can click on the **Help Icon** (?) above this column of data to view the codes or chose the correct code from the drop down menu.

Five-Digit NAICS Code

The NAICS codes published by the Office of Management and Budget (OMB) have superseded the 1987 Standard Industrial Classification (SIC) code system. Report the five-digit NAICS code that corresponds to the appropriate industrial setting for the particular combination of process/use and IFC codes. The NAICS code classification system is being used to describe the industrial setting in which chemical exposures may occur. You are required to report the five-digit NAICS code(s) for all sites that receive a reportable chemical substance from you either directly or indirectly (including through a broker/distributor, from a customer of yours, etc.) and that process and use the reportable chemical substance to the extent that this information is readily obtainable. However, EPA does not intend for you to survey your customers or distributors to precisely identify the appropriate NAICS codes at your “downstream” sites. Because a NAICS code may apply to more than one processing and use scenario for a chemical substance, the same NAICS code may be reported with different IFC codes.

The NAICS codes have been provided in a searchable screen, which allows you to search for the correct code by either using the search button or scrolling through the codes. You can select a NAICS codes by double clicking on the appropriate code. You also may enter an appropriate code into the text box.

Check the **CBI Box** to claim the NAICS code as confidential. The NAICS codes can contain a maximum of 6 digits, although you should only report the first five digits for purposes of IUR.

Industrial Function Category (IFC) Code

Report the Industrial Function Category (IFC) code, shown in Table 4, that corresponds to the appropriate function for the particular combination of process/use and NAICS codes reported. Check the **CBI Box** to claim the IFC code as confidential.

You may select the appropriate IFC code from the drop down menu or you may enter the appropriate code into the text box.

Table 4 - Codes for Reporting IFCs

Codes	Industrial Function Categories
U01	Adsorbents and absorbents
U02	Adhesives and binding agents
U03	Aerosol propellants
U04	Agricultural chemicals (non-pesticidal)
U05	Anti-adhesive agents
U06	Bleaching agents
U07	Coloring agents, dyes
U08	Coloring agents, pigments
U09	Corrosion inhibitors and anti-scaling agents

Codes	Industrial Function Categories
U10	Fillers
U11	Fixing agents
U12	Flame retardants
U13	Flotation agents
U14	Fuels
U15	Functional fluids
U16	Intermediates
U17	Lubricants
U18	Odor agents
U19	Oxidizing agents
U20	pH-regulating agents
U21	Photosensitive chemicals
U22	Plating agents and metal surface treating agents
U23	Processing aid, not otherwise listed
U24	Process regulators, used in vulcanization or polymerization processes
U25	Process regulators, other than polymerization or vulcanization processes
U26	Reducing agents
U27	Solvents (for cleaning or degreasing)
U28	Solvents (which become part of product formulation or mixture)
U29	Solvents (for chemical manufacture and processing and are not part of product at greater than 1% by weight)
U30	Stabilizers
U31	Surface active agents
U32	Viscosity adjustors
U33	Other

Percentage of Production Volume

Estimate the percentage of production volume that is attributable to each unique combination of process/use code, NAICS code, and IFC code. The quantity should be accurate to the extent that it is readily obtainable by you. Round your estimates to the nearest 10 percent of production volume. You may not round a particular combination that accounts for 5 percent or less of the total production volume of a reportable chemical substance to 0 percent if the production volume attributable to that combination is greater than or equal to 300,000 pounds. In such cases, you must report the percentage of production volume attributable to that combination to the nearest 1 percent of production volume. To claim this information as confidential, check the **CBI Box**.

The total percentage of production volumes associated with the process or use/NAICS/IFC combinations may add up to more than 100 percent, given that you are reporting on distribution of a chemical to sites in your control as well as downstream

sites, some of which are not immediate purchasers from your original manufacturing site. Additionally, the total percentage of production volume may add up to less than 100 percent if you cannot readily obtain information about how all of your production volume is processed or used, there are more than 10 unique combinations applicable to your chemicals, or you export a portion of the production volume.

Number of Sites Code

For each unique combination of process/use, NAICS, and IFC codes, report an estimate of the total number of industrial sites, including those not under your control, that process or use each reported chemical substance manufactured (including imported) by you, to the extent that such information is readily obtainable. In the event you both manufacture (including import) and process or use the same reportable chemical substance at the reporting plant site, your site must be counted as both a manufacturing site in **Part II** of Form U and a processing or use site reported in **Part III** of Form U. For each substance, report the code listed in Table 5 and provided in the drop down table that corresponds to the appropriate number range. To claim this information as confidential, check the **CBI Box**.

Table 5 - Codes for Reporting Numbers of Sites

Codes	Range
S1	Less than 10
S2	At least 10 but less than 25
S3	At least 25 but less than 100
S4	At least 100 but less than 250
S5	At least 250 but less than 1,000
S6	At least 1,000 but less than 10,000
S7	10,000 or greater

As stated above, you can click on the **Help Icon** (?) above this column of data to view the codes or chose the correct code from the drop down menu.

Number of Workers Code

For each unique combination of process/use, NAICS, and IFC codes, report your estimate of the total number of workers, including those at sites not under your control, that are reasonably likely to be exposed to the chemical substance at sites that process or use the substance, to the extent that such information is readily obtainable. For each substance, report the range code listed in Table 6 that corresponds to the appropriate number of workers. To claim this information as confidential, check the **CBI Box**.

“Reasonably likely to be exposed” means “an exposure to a chemical substance which, under foreseeable conditions of manufacture (including import), processing, distribution in commerce, or use of the chemical substance, is more likely to occur than not to occur.

Such exposures would normally include, but would not be limited to, activities such as charging reactor vessels, drumming, bulk loading, cleaning equipment, maintenance operations, materials handling and transfers, and analytical operations. Covered exposures include exposures through any route of entry (inhalation, ingestion, skin contact, absorption, etc.), but excludes accidental or theoretical exposures” (40 CFR 710.43).

Persons reasonably likely to be exposed to a chemical substance include workers whose employment requires them to pass through areas where chemicals are manufactured, processed, or used (e.g., production workers and foremen, process engineers, and plant managers). Workers employed to drive vehicles that transport the chemical should be included in the number of workers reasonably likely to be exposed to the chemical substance *if* they come into contact with the chemical during loading or unloading. For example, workers engaged in the connection or disengagement of hoses used to load or unload the chemical should be included. However, workers involved solely with transporting chemicals in sealed (totally enclosed with no potential for exposure) containers should not be included.

In addition, when a site employs temporary, seasonal, or contract workers in the manufacture of a reportable chemical substance, these workers should be included in the number of workers reasonably likely to be exposed to a chemical substance if they work in areas where the chemical is manufactured. The term does not include those employees whose jobs are unassociated with potential exposures to a substance or mixture (e.g., administrative staff who never enter areas where the chemical is manufactured) and who are unlikely to be exposed to a chemical substance for even a brief period of time. No allowance is made for personal protective equipment or for engineering controls that reduce but do not preclude exposure to a chemical substance; however, if contact between a worker and a chemical is highly improbable, the worker should not be included among those persons reasonably likely to be exposed to the chemical substance.

Table 6 – Codes for Reporting Number of Industrial Workers Reasonably Likely to be Exposed

Code	Range of Workers Reasonably Likely to be Exposed
W1	Fewer than 10
W2	At least 10 but fewer than 25
W3	At least 25 but fewer than 50
W4	At least 50 but fewer than 100
W5	At least 100 but fewer than 500
W6	At least 500 but fewer than 1,000
W7	At least 1,000 but fewer than 10,000
W8	10,000 or greater

As stated above, you can click on the **Help Icon** (?) above this column of data to view the codes or chose the correct code from the drop down menu.

SECTION B: Commercial and Consumer Use Data Tab (Blocks 3.B.1 through 3.B.10)

You are required to report readily obtainable information concerning the commercial and consumer end uses of each reportable chemical substance manufactured (including imported) at sites you control and at sites controlled by people to whom you have either directly or indirectly (including through a broker/distributor, from a customer, etc.) distributed the reportable chemical substance.

As with the industrial processing and use information, this requirement applies only to each chemical substance manufactured (including imported) in annual quantities of 300,000 pounds or more, and you are required only to report information to the extent that it is readily obtainable. If this information is not readily obtainable, enter '**NRO**' for "not readily obtainable" in the box corresponding to that data element.

Consumer and Commercial Product Category Code

You must designate up to 10 commercial and consumer product categories that correspond to the actual use of the chemical substance by selecting from the codes listed in Table 7 and available in the drop down menu. Guidance on the scope of these categories is available in the Instructions for Reporting, available from the IUR website. If more than 10 codes apply, you need report only the 10 codes for the chemical substance that cumulatively represent the largest percentage of production volume, measured by weight. To claim this information as confidential, check the **CBI Box**.

Table 7 - Codes for Reporting Commercial and Consumer Product Categories

Codes	Category
C01	Adhesives and sealants
C02	Agricultural products (non-pesticidal)
C03	Artists' supplies
C04	Automotive care products
C05	Electrical and electronic products
C06	Fabrics, textiles and apparel
C07	Glass and ceramic products
C08	Lawn and garden products (non-pesticidal)
C09	Leather products
C10	Lubricants, greases and fuel additives
C11	Metal products

Codes	Category
C12	Paints and coatings
C13	Paper products
C14	Photographic supplies
C15	Polishes and sanitation goods
C16	Rubber and plastic products
C17	Soaps and detergents
C18	Transportation products
C19	Wood and wood furniture
C20	Other

As stated above, you may click on the **Help Icon** (?) above this column of data to view the codes or chose the correct code from the drop down menu.

Use in Products Intended for Children

You must determine, within each commercial and consumer product category reported, whether any amount of each reportable chemical substance manufactured (including imported) by you is present in or on any consumer products intended for use by children age 14 or younger, regardless of the concentration of the substance remaining in or on the product.

If you determine, based on readily obtainable information, that your chemical substance or mixture is used in a consumer product intended for use by children, report a “**Y**” in the appropriate box in the “**Used in Products Intended for Children**” column.

If you determine, based on readily obtainable information, that your chemical substance or mixture is not used in a consumer product intended for use by children, report an “**N**.” If this information is not readily obtainable, enter “**NRO**” in the appropriate box. To claim this information as confidential, check the **CBI Box**.

EPA defines “intended for use by children” to mean the chemical substance or mixture is used in or on a product that is specifically intended for use by children age 14 or younger (40 CFR 710.43). Your chemical substance or mixture is intended for use by children when you answer “yes” to at least one of the following questions for the product into which your chemical substance or mixture is incorporated:

- (1) Is the product commonly recognized (i.e., by a reasonable person) as being intended for children age 14 or younger?
- (2) Does the manufacturer of the product state through product labeling or other written materials that the product is intended or will be used by children age 14 or younger? or

- (3) Is the advertising, promotion, or marketing of the product aimed at children age 14 or younger?

Table 8 illustrates some examples of “Use in Products Intended for Children.” For example, EPA believes that certain products, like crayons, coloring books, diapers, and toy cars - to name a few - are typically used by children age 14 or younger. If you determine, based on readily obtainable information, that your chemical substance or mixture is used in crayons, for example, you would report a “Y” in the Children’s Product column for category C01.

Certain products, such as household cleaning products, automotive supplies, and lubricants, are not typically intended to be used by children age 14 or younger. As such, if you determine, based on readily obtainable information, that your chemical substance or mixture is used in automotive care products and lubricants, for example, you would report an “N” in the Children’s Use column for categories C04 and C10.

Table 8 - Examples of Products Intended for Children

Codes	Category	Examples
C01	Adhesives and sealants	Craft glue, model glue
C02	Agricultural products (non-pesticidal)	Typically, products in this category are not likely to be intended for use by children aged 14 or younger
C03	Artists’ Supplies	Chemicals used as colorants in crayons, drawing inks, markers
C04	Automotive care products	Typically, products in this category are not likely to be intended for use by children 14 or younger
C05	Electrical and electronic products	Electronic games, remote control cars
C06	Fabrics, textiles and apparel	Children’s clothing, generally
C07	Glass and ceramic products	Porcelain dolls
C08	Lawn and garden products (non-pesticidal)	Lawn and gardening tools designed specifically for children (e.g., kids rake)
C09	Leather products	Shoes, jackets, baseball gloves
C10	Lubricants, greases and fuel additives	Typically, products in this category are not likely to be intended for use by children 14 or younger
C11	Metal products	Toy trucks, toy cars, wagons
C12	Paper products	Diapers, baby wipes, coloring books
C13	Paints and coatings	Paints, varnishes, and shellac coatings
C14	Photographic supplies	Typically, products in this category are not likely to be intended for use by children 14 or younger

Codes	Category	Examples
C15	Polishes and sanitation goods	Typically, products in this category are not likely to be intended for use by children 14 or younger
C16	Rubber and plastic products	Pacifiers, action figures, balls
C17	Soaps and detergents	Baby shampoo, children's bubble bath
C18	Transportation products	Child's car seat
C19	Wood and wood furniture	Baby cribs, changing tables, wooden toys
C20	Other	Other items specifically intended for use by children age 14 or younger

Percentage of Production Volume

You are required to estimate the percentage of your production volume for each reportable chemical substance that is attributable to each specific commercial and consumer end use carried out at sites under your control, as well as at sites that receive a reportable chemical substance from you either directly or indirectly (including through a broker/distributor, from a customer, etc.), to the extent that such information is readily obtainable. Round your estimates to the nearest 10 percent of production volume.

However, you may not round a commercial and consumer product category that accounts for 5 percent or less of the total production volume of a reportable chemical substance to 0 percent if the production volume attributable to that commercial and consumer product category is greater than or equal to 300,000 pounds. In such cases, you must report the percentage of production volume attributable to that commercial and consumer product category to the nearest one percent of the production volume. To claim this information as confidential for this substance, check the **CBI Box**.

The total percentage of production volumes reported may add up to more than 100 percent, given that you are reporting production volumes to the nearest 10 percent. The total percentage of production volume may add up to less than 100 percent due to rounding, or if you cannot readily obtain information about how all of your production volume is used in commercial and consumer products, or if there are more than 10 commercial or consumer product categories applicable to your chemical substance.

Maximum Concentration Code


For each commercial and consumer product category, you are required to report estimates, in ranges, of the maximum concentration (measured by weight) of each reportable chemical substance likely to be present in commercial and consumer products manufactured (including imported) at sites under your control and at sites where your commercial and consumer products are distributed directly or indirectly (including through a broker/distributor, from a customer, etc.) Such information is required only to the extent that it is readily obtainable by you; otherwise, enter "**NRO**." The reporting

range codes are listed in Table 9 and available in the drop down menu. To claim this information as confidential, check the **CBI Box**.

Table 9 - Codes for Reporting Maximum Concentration of Chemical Substance

Code	Concentration Range (weight percent)
M1	Less than 1% by weight
M2	From 1% to 30% by weight
M3	From 31% to 60% by weight
M4	From 61% to 90% by weight
M5	Greater than 90% by weight

As stated above, you may click on the **Help Icon** () above this column of data to view the codes or chose the correct code from the drop down menu.



Once you have completed this screen, use the forward and back arrows () located on the top right corner of the page, or the **IUR Form Navigator** (left pane) to navigate to other screens in the eIUR software if you still need to complete other sections of the form.



Cover Letter

You have the option of including a **Cover Letter** as part of your electronic data file. A cover letter is not mandatory or expected but can include any information you wish to convey to EPA.

In this tool, the Cover Letter field is a large (10,000 character) free-text field. To enter cover letter information, simply click on the **Cover Letter Screen** in the **IUR Form Navigator** (left pane). Next, enter any information in the data entry screen that you would like to convey to EPA for use as a cover letter for your submission.

Once you have completed this screen, use the forward and back arrows ( ) located in the top right corner of the page, or the **IUR Form Navigator** (left pane), to navigate to other portions of the form.

Acronyms

CAS	Chemical Abstract Service
CASRN	Chemical Abstract Service Registry Number
CBI	Confidential Business Information
CDX	Central Data Exchange
eIUR	Electronic Inventory Update Reporting
EPA	Environmental Protection Agency
IFC	Industrial Function Category
IUR	Inventory Update Reporting
MSDS	Material Safety Data Sheet
N/A	Not Applicable
NAICS	North American Industry Classification System
NRO	Not Readily Obtainable
OMB	Office of Management and Budget
PDF	Portable Document Format
PMN	Premanufacture Notice
SIC	Standard Industrial Classification
TSCA	Toxic Substances Control Act
US	United States
XML	Extensible Markup Language