



Chemical Identity Requirements

For each chemical reported in a PMN or Bona Fide submission, the following are required:

- ◆ *Correct CA Index or Preferred Name for TSCA purposes*
- ◆ *CAS Registry Number (if one is available for that name)*
- ◆ *Complete chemical structure for a Class 1 substance and representative or partial structure(s) for a Class 2 substance*
- ◆ *Molecular Formula (where applicable)*
- ◆ *List of reactants and brief description of reaction or process for manufacturing Class 2 substance*
- ◆ *For polymers, all information requested according to Page 5 of EPA's PMN Form*



Methods for Acquiring CAS Nomenclature

◆ Method 1:

- ◆ Use CAS Inventory Expert Service and submit CAS results to EPA***
- ◆ EPA will accept the CAS results provided that there are no changes made after CAS assigned the name and there are no inconsistencies in the notice***

◆ Method 2:

- ◆ Use any other source or service bureau***
- ◆ If EPA has a problem with the CAS name, CAS number, chemical formula, or process description submitted, the submitter must correct the problem before PMN review can proceed***



Importing a Confidential Chemical Substance

You must request your foreign supplier to comply with the chemical identity and CAS nomenclature requirements and send the information to EPA on your behalf



Substances Involving a Confidential Trade Mark Reactant

- ◆ *CAS nomenclature is not required for a chemical substance made from a confidential trademark reactant not specifically identified to the submitter*
- ◆ *Submitter must still ensure that the trade mark reactant supplier provides the necessary chemical identity information directly to EPA on the submitter's behalf*