

- ' A "sanitized" version of a completed trade secret substantiation form (staple the pages together).

Securely fasten all four reports together.

Some states also require submission of both sanitized and unsanitized reports for EPCRA section 313 chemicals whose identity is claimed as a trade secret. Others require only a sanitized version. Facilities may jeopardize the trade secret status of an EPCRA section 313 chemical by submitting an unsanitized version of the EPCRA section 313 report to a state agency or Indian tribe that does not require unsanitized forms. You may identify an individual state's submission requirements by contacting the appropriate state-designated EPCRA section 313 contact (see Appendix F).

Excerpt from Reporting Forms & Instructions for RY2002:

A.3 Trade Secret Claims

For any EPCRA section 313 chemical whose identity is claimed as trade secret, you must submit to EPA two versions of the substantiation form as prescribed in 40 CFR Part 350, published July 29, 1988, in the Federal Register (53 FR 28772) as well as two versions of the EPCRA section 313 report. One set of reports, the "unsanitized" version, must provide the actual identity of the EPCRA section 313 chemical. The other set of reports, i.e., the "sanitized" version, must provide only a generic identity of the EPCRA section 313 chemical. If EPA deems the trade secret substantiation form valid, only the sanitized set of forms will be made available to the public.

Use the order form in this document to obtain copies of the rule and substantiation form. Further explanation of the trade secret provisions is provided in Part I, Sections 2.1 and 2.2, and Part II, Section 1.3, of the instructions.

In summary, a complete report to EPA for an EPCRA section 313 chemical claimed as a trade secret must include all of the following:

- ' A completed "unsanitized" version of Form R or Form A report including the EPCRA section 313 chemical identity (staple the pages together); and
- ' A "sanitized" version of a completed Form R or Form A report in which the EPCRA section 313 chemical identity items (Part II, Sections 1.1 and 1.2) have been left blank but in which a generic chemical name has been supplied (Part II, Section 1.3) (staple the pages together); and
- ' A completed "unsanitized" version of a trade secret substantiation form (staple the pages together); and

Where to send your trade secret submission

Please send only trade secret submissions to the P.O. box below.

To send trade secret submissions by regular mail:

EPCRA Substantiation Packages
P.O. Box 1515
Lanham, MD 20703-1515

To send trade secret submissions by certified mail or overnight mail (i.e. Fed Ex, UPS, etc.):

TRI Data Processing Center
c/o Computer Sciences Corporation
Suite 300
8400 Corporate Drive
Landover, MD 20785-2294
Attention: EPCRA Substantiation Packages
301 429-5005