



EPA

United States
Environmental Protection
Agency

Module 3: Completing Form U for 2016 Chemical Data Reporting

Office of Chemical Safety and Pollution Prevention

PREFACE

Welcome to *Training Module 3:* *Completing Form U for 2016 Chemical Data Reporting*

This is the third in EPA's series of seven Training Modules to assist you in complying with the requirements of the Chemical Data Rule (CDR) rule for the 2016 submission period. This Training Module will cover completing Form U, the CDR reporting form.

Detailed information about the 2016 reporting requirements can also be found in the *Instructions for Reporting 2016 TSCA Chemical Data Reporting* guidance document available on EPA's website at www.epa.gov/cdr.

This Training Module does not substitute for the CDR rule and does not impose legally binding requirements on the regulated community or on the U.S. Environmental Protection Agency.



TRAINING AGENDA: MODULE 3

- Introduction
- Overview of Form U Requirements
 - Reporting Standard
 - Making Confidential Business Information (CBI) Claims
- Form U, Part I: Reporting Parent Company, Site, and Technical Content Information
- Form U, Part II: Reporting Chemical Substance and Manufacturing Information
- Form U, Part III: Reporting Processing and Use Information
- Completing Form U

INTRODUCTION

For the 2016 submission period, manufacturers (including importers) are required to use e-CDRweb, the CDR reporting tool, and EPA's Central Data Exchange (CDX) to create an electronic version of Form U.

EPA no longer accepts paper forms or electronic media (diskette, CD-ROM, etc.) for any CDR submission. For more information about electronic reporting, please see the following:

- Module 4: Registering with CDX for CDR Reporting
- Module 5: Using the e-CDRweb Reporting Tool

A separate Form U is required for each site (40 CFR 711.15(a)). If you need to report information for more than one reportable chemical substance at your site, submit the information for all the chemical substances on one Form U.

OVERVIEW OF FORM U REQUIREMENTS

A Separate Form U is Required for Each Site

- Information for all reportable chemical substances at a site must be included on one Form U.
- Some of the Parts of Form U may need to be completed more than once and some Parts may not be applicable:
 - Complete the certification statement and **Part I** once for each site.
 - Complete **Part II** for each reportable chemical substance at a site.
 - Complete **Part III** for each reportable chemical substance at a site.
 - Complete **Part IV** only for the special case of a joint submission.

See Module 6 for more information on CDR Joint Submissions

See 40 CFR 711.15

OVERVIEW OF FORM U REQUIREMENTS

Reporting Standard for Form U

- The information reported on a Form U must be reported to the extent that it is **known to or reasonably ascertainable by (KRA)** the submitter:
 - Definition:** “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.” *See 40 CFR 704.3*
- KRA information includes, but is not limited to, information that may be possessed by employees or other agents of the submitting company:
 - Employees or other agents may include persons involved in the research, development, manufacturing, or marketing of a chemical substance.
 - KRA information may include knowledge gained through discussions, symposia, and technical publications.

OVERVIEW OF FORM U REQUIREMENTS

Examples of KRA Reportable Information Sources

- The 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 include:

Files maintained by the submitter or employees in the submitter's company, such as chemical or other technical data, marketing studies, sales reports or customer surveys

Information contained in standard references, such as MSDSs, that contain use information or concentrations of chemicals in mixtures, etc.

Information derived from the Chemical Abstracts Service Registry Number (CASRN) and the Dun & Bradstreet (D&B) number.

Some inquiry outside the organization may be needed:

This would only be to fill gaps in the submitter's knowledge.

Submitters are **not required** to conduct new or additional customer surveys (i.e., a comprehensive set of identical questions sent to multiple customers) to obtain the information for a Form U.

OVERVIEW OF FORM U REQUIREMENTS

Making CBI Claims

Claims for **Confidential Business Information (CBI)** should be made only when absolutely necessary.

Procedures for assertion and review of confidentiality claims are found at 40 CFR Part 2, Subpart B and 40 CFR 711.30.

Up-front substantiation is required for certain confidentiality claims:

- Chemical Identity

- Site Identity

- Processing and Use Information

Confidentiality claims cannot be made when a response is left blank or designated as **“not known or reasonably ascertainable” (NKRA)**.

It is important for submitters to follow proper procedures to ensure that information legitimately claimed as CBI remains protected.

OVERVIEW OF FORM U REQUIREMENTS

Making CBI Claims – cont'd

To assert reportable data as CBI:

Check the “CBI” box next to the appropriate data element in Form U.

For data elements requiring upfront substantiation, checking a “CBI” box will prompt a list of questions that must be answered and submitted to EPA to substantiate the CBI claim.

Ensure that the signature of the Authorized Official (AO) accompanies any submitted substantiation information – this will occur when the AO submits the form. (*See Module 5*)

Specific instructions for claiming the **site identity, chemical identity, and processing and use data** as CBI are covered as part of the discussion of completion of these respective sections of Form U, later in this training module.

FORM U, PART I – OVERVIEW

Form U, Part I consists of the following sections:

Section A. Parent Company Information

- U.S. parent company name, Dun & Bradstreet (D&B) number, full mailing address

Section B. Site Information

Site name, site D&B number, full mailing address

Section C. Technical Contact Information

Name, company name, phone number, e-mail, full mailing address

Note: Information provided during CDX registration will populate some of the boxes. Double-check to see that all required fields are complete and accurate. Correct, if necessary, by accessing your information in CDX.

FORM U, PART I – ADDITIONAL INFORMATION

Section A. Parent Company and Section B. Site Information

Section A. The *U.S. parent company* means the highest-level company, located in the United States, that directly owns at least 50% of the voting stock of the manufacturer. (See 40 CFR 711.3)

Section B. Importers must report a U.S. address for the site.

Sections A. and B. Dun & Bradstreet (D&B) numbers are required for company and site:

D&B assigns separate numbers to subsidiaries and parent companies. Be sure to provide the correct numbers on Form U for the **U.S. parent company** and **site**.

To request a D&B number, or if your company has a number but you do not know it, contact D&B at 800-234-3867 or www.dnb.com.

FORM U, PART I – ADDITIONAL INFORMATION

Section C. Technical Contact Information

- Select the technical contact from the drop-down list of contacts previously entered on Form U for that particular site, or enter new information.
- The technical contact should be a person who can answer questions about the reportable chemical substance(s):
 - Companies may use their discretion in populating one or multiple technical contacts; however, **only one technical contact** can be identified per chemical report in a single Form U.
 - EPA may contact this person for clarification of the information in the CDR submission. While this contact is likely to be within the year following submission, contact may be during future years.
 - Typically, the technical contact will be located at the manufacturing site.
 - The technical contact does not need to be the person who signed the certification statement.



FORM U, PART I – ADDITIONAL INFORMATION

CBI Claims

You can claim as confidential the company, site, or technical contact information:

Such CBI claims are chemical specific and therefore are identified by checking the appropriate box in Form U, Part I.

You cannot make generic, universal CBI claims that cover all chemicals reported on your Form U.

Site identity CBI claims require up-front substantiation:

For data elements requiring upfront substantiation, checking a “CBI” box will prompt a list of questions that must be answered and to substantiate the CBI claim.

Claiming company identity as confidential does not protect the site identity, even if they have the same name.

FORM U, PART II – OVERVIEW

Form U, Part II consists of the following sections:

Section A. Chemical Substance Identification

- Chemical substance identifying number: Chemical Abstracts Service Registry Number (CASRN) or TSCA Accession Number
- ID code: **C** (for CASRN) or **A** (for Accession Number)
- Chemical name: CA Index Name or Generic chemical name

Section B. Manufacturing Information

- Calendar year 2015:
 - Report production volumes for activities related to domestic manufacture and import.
 - Answer questions about manufacturing activities.
 - Select codes for certain data elements.
- Calendar years 2012-2014:
 - Report annual production volume only.

FORM U, PART II.A – ADDITIONAL INFORMATION

Section A. Chemical Substance Identification

Use EPA's [Substance Registry Services](#) (SRS) to search for the chemical identification required for each reportable chemical substance:

- The SRS is EPA's central system for information about chemical substances that are tracked or regulated by EPA or other sources.
- You can connect directly to the SRS database from the reporting tool.
- For each non-confidential chemical substance on the TSCA Inventory, you must report the correct CA Index Name and CASRN.
- For each chemical substance on the confidential portion of the TSCA Inventory, you must report the TSCA Accession Number and generic chemical name.
- The Premanufacture Notice (PMN) Case Number cannot be used to report a confidential chemical substance, but it can be used in SRS to find the correct Accession Number.

Note: Special provisions for chemical identification in joint submissions are covered in Module 6.

FORM U, PART II.A – ADDITIONAL INFORMATION

This is a screen shot of an SRS search. Search by:

- CASRN
- CAS Index Name
- Accession Number
- Generic Name.

The CASRN must be used as the identifying number for a non-CBI substance. The Accession Number must be used for a confidential substance.

Chemical substance information from the SRS will automatically populate Section 2.A. of Form U.

The screenshot shows the CSPP Substance Registry Services Search interface. The page is titled "SUBSTANCE REGISTRY SERVICES SEARCH" and includes the CSPP logo. The user is logged in as "EPAUSERAO42, Primary Authorized Official". The interface is divided into two main search sections: "Please search by CASRN or CA Index Name" and "Please search by Accession Number and/or Generic Name".

Search by CASRN or CA Index Name:

- 1. CASRN: Matches exactly
- 2. CA Index Name or Other Synonym: Begins with
- Search button

OR

Search by Accession Number and/or Generic Name:

- 1. Accession Number: Begins with
- 2. Generic Name: Begins with
- Search button

The background shows a sidebar with a tree view of chemical reports, including "Formaldehyde" and "Company & Site Identification Information".

FORM U, PART II.A – ADDITIONAL INFORMATION

CBI Claims for Chemical Identity

- Chemical identity claims are limited to only those chemical substances listed on the confidential portion of the Master Inventory File:
 - Chemical identities on the public version of the TSCA Inventory are already publicly known and cannot be claimed as CBI.
 - To assert a confidentiality claim for the TSCA Accession Number corresponding to the confidential chemical substance intended to be reported, check the “CBI” box in Block 2.A.1.
 - To protect the link between chemical identity and company name, check the box associated with the company name.
- Checking the “CBI” box automatically triggers substantiation questions:
 - Detailed answers, which must be complete and specific to the chemical substance in question, must be submitted to EPA.
 - If you answer “Yes” to question 11 about other confidentiality determinations, write the file name in the text box and electronically attach the relevant document.

FORM U, PART II.B – ADDITIONAL INFORMATION

This is a screen shot of part of the **manufacturing information** blocks for Section 2.B. of Form U. The information for this section will be reviewed on the next few slides.

2016 Form U > 2009 N 14TH STREET, LLC > Alkylsilanes Chemical Report > Manufacturing Information (2.B)

SECTION 2.B - MANUFACTURING INFORMATION

Company Identification (2.B.1) CBI Number of Workers (2.B.10) CBI
Site Identification (2.B.2) Max Concentration (2.B.11)
Technical Contact Information (2.B.3) Is chemical being recycled, remanufactured, reprocessed, reused, or reworked? (2.B.12)

Report CY 2015 Production Volume

Activity (2.B.4) Manufacture CBI Import CBI CBI

Domestically Manufactured (2.B.5) lbs.

Imported (2.B.6) lbs.

Imported Chemical Never Physically at Site (2.B.7)

Volume Used on Site (2.B.8) lbs.

Volume Exported (2.B.9) lbs.

Report Physical Form

Report Physical Form	Applies	CBI	% Production Volume of 0 lbs.	CBI
Dry Powder (2.B.13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>
Pellets or Large Crystals (2.B.14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>

Sort Chemicals By Date
Add Chemical
Add Joint Submission
Upload XML

Validate Save Preview Submit

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FORM U, PART II.B – ADDITIONAL INFORMATION

Section B. Manufacturing Information: Volumes

- **For calendar year 2015**, report for each chemical substance:
 - Volume domestically manufactured at site (Block 2.B.5).
 - Volume imported by site – Add volumes of same chemical substances in mixtures (Block 2.B.6).
 - Volume used on site – Total domestically manufactured and imported that never leaves the site (Block 2.B.8).
 - Volume exported – Directly exported and not domestically processed or used (Block 2.B.9).
- **For calendar year 2012-2014**, report for each chemical substance:
 - Volume domestically manufactured plus imported (Block 2.B.20).
- Report all required volumes in pounds to at least two significant figures, using numeric format.

FORM U, PART II.B – ADDITIONAL INFORMATION

Section B. Manufacturing Information for 2015: Selecting Answers

- **Activity:** Domestically manufacture and/or import (Block 2.B.4)
 - Check boxes for one or both.
- Is imported chemical substance never physically present at site? (Block 2.B.7)
 - Select “Y” (Yes), “N” (No), or “NKRA” (Not known or reasonably ascertainable).
- Is chemical substance being recycled, remanufactured, reprocessed, or reused? (Block 2.B.12)
 - Select “Y,” “N,” or “NKRA.”
 - By selecting “Y”, you indicate that the chemical substance, which otherwise would be disposed of as a waste, is being removed from, or is not entering, a waste stream and is being used or reused for a commercial purpose.

FORM U, PART II.B – ADDITIONAL INFORMATION

Section B. Manufacturing Information: Selecting Codes

Maximum concentration, by weight, of the chemical substance at time it is reacted on site or as it leaves the site (Block 2.B.11)

– Select code from list below.

Code	Maximum Concentration (y) in Weight Percent
M1	$y < 1\%$
M2	$1\% \leq y < 30\%$
M3	$30\% \leq y < 60\%$
M4	$60\% \leq y < 90\%$
M5	$y \geq 90\%$

Total number of workers reasonably likely to be exposed to the chemical substance (Block 2.B.10)

– Select code from list below.

Code	Number of Workers (x) Reasonably Likely to be Exposed
W1	$x < 10$
W2	$10 \leq x < 25$
W3	$25 \leq x < 50$
W4	$50 \leq x < 100$
W5	$100 \leq x < 500$
W6	$500 \leq x < 1,000$
W7	$1,000 \leq x < 10,000$
W8	$x \geq 10,000$

FORM U, PART II.B – ADDITIONAL INFORMATION

Section B. Manufacturing Information for 2015

Number of workers “reasonably likely to be exposed” (Block 2.B.10)

- “An exposure to a chemical substance which, under foreseeable conditions of manufacture, processing, distribution in commerce, or use of the chemical substance, is more likely to occur than not to occur.” (See 40 CFR. 711.3)
- Persons reasonably likely to be exposed would normally include:
 - Workers passing through areas where chemical substances are manufactured, processed or used.
 - Workers who drive transport vehicles, if they are in contact with the chemical substance during loading and unloading.
 - Temporary, seasonal, or contract workers if they work in areas where the chemical substance is manufactured.
- When there is no potential exposure to a chemical substance, use code W1 for <10 workers, e.g., import in sealed containers or import sent from foreign source directly to customer.

FORM U, PART II.B – ADDITIONAL INFORMATION

Section B. Manufacturing Information: Physical Form

Physical Form: Check the appropriate box(es) to indicate all the physical form(s) of the chemical substance at the time it is reacted or as it left the site in 2015:

Dry powder (Block 2.B.13)

Pellets or Large Crystals (Block 2.B.14)

Water- or Solvent-Wet Solid (Block 2.B.15)

Other Solid (Block 2.B.16)

Gas or Vapor (Block 2.B.17)

Liquid (Block 2.B.18)

Unknown (if the physical form is not known or reasonably ascertainable by you) (Block 2.B.19).

% PV: Report the percentage of the total production volume of each physical form reacted on-site or sent off-site for 2015:

Round percentages to the nearest 10%.

Percentages may total more or less than 100% due to rounding.

FORM U, PART III – OVERVIEW

Who Must Complete Part III?

- Manufacturers (including importers) that report to CDR for a chemical substance must complete Part III unless they are listed as partially exempt under 40 CFR 711.6(b).
- Processing and use must be reported for each of those chemical substances:
 - At sites under the submitter’s control, and
 - At domestic sites that receive a reportable chemical substance from the submitter directly or indirectly (e.g., through a broker/distributor, from a customer of the submitter, etc.).
- Partially exempt chemical substances include listed petroleum streams, and listed chemicals of low current interest.
- Check the N/A box for “Not Applicable” if:
 - You manufacture a chemical substance that is partially exempted and do not need to complete Part III, **or**
 - If one section does not apply, e.g., if a chemical substance is fully reacted during industrial processing and use (Section A), it will not have consumer or commercial uses (Section B).

See 40 CFR 711.15(b) and 711.15(b)(4)



FORM U, PART III – OVERVIEW

Form U, Part III, consists of the following:

Section A. Industrial Processing and Use Data for 2015 (Blocks 3.A.1.–3.A.10)

Report up to 10* unique combinations of:

- Type of Process or Use (TPU);
- Industrial Sector (IS);
- Industrial Function Category (IFC).

For each of these unique combinations, also report:

- % Production Volume; # Sites; # Workers.

Section B. Consumer and Commercial Use Data for 2015 (Blocks 3.B.1.–3.B.10)

- Report up to 10* Product Categories.
- For each Product Category, also report:
 - Consumer use/commercial use/both; Used in Products Intended for Children.
 - % Production Volume; Maximum Concentration; # Commercial Workers.

*If more than 10 apply, they can all be reported; however, only the 10 that cumulatively represent the largest % production volume for that chemical substance, measured by weight, must be reported.

FORM U, PART III – ADDITIONAL INFORMATION

CBI Claims for Processing and Use Information

- Processing and use information reported in Part III may be claimed confidential:
 - To make CBI claims for Part III, you must believe that release of the information would reveal trade secrets or confidential commercial or financial information.
 - Check the appropriate “CBI” box(es) to claim processing and use information CBI.
 - **For each box checked** in Part III, you must substantiate your claims with written answers.
 - “NKRA” responses may not be claimed CBI.
- Checking “CBI” boxes in Part III automatically triggers **substantiation questions**:
 - Detailed answers, which must be complete and specific to the chemical substance and data element in question, must be submitted to EPA.
 - If a chemical substance is used in products intended for use by children, submitters are **encouraged not** to claim the information as confidential.

FORM U, PART III.A – ADDITIONAL INFORMATION

This is a screen shot of the **Industrial Processing and Use** Section of Form U. The information for Section 3.A. will be reviewed on the next few slides.

CSPP
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 Log Out

2016 Form U > 2009 N 14TH STREET, LLC > Alkylsilanes Chemical Report > Industrial Processing and Use (3.A)

SECTION 3.A - INDUSTRIAL PROCESSING AND USE

Not Applicable

	Type of Process or Use		Sector(s)		Industrial Function Category		Percent Production Volume		Number of Sites		Number of Workers		
	Code	CBI	Code	CBI	Code	CBI	%	CBI	Code	CBI	Code	CBI	
(3.A.1)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	✗
(3.A.2)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	✗
(3.A.3)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	✗
(3.A.4)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	✗
(3.A.5)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	✗
(3.A.6)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	✗
(3.A.7)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	✗
(3.A.8)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	✗
(3.A.9)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	✗
(3.A.10)	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="checkbox"/>	+

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FORM U, PART III.A – ADDITIONAL INFORMATION

TPU: Report the **Type of Processing or Use (TPU)** operation for each combination of IS and IFC codes.

IS: Report the **Industrial Sector (IS)** for all sites that receive the chemical substance. EPA has replaced the 5-digit North American Industrial Classification System (NAICS) codes with 48 IS Codes.*

IFC: Report the **Industrial Function Category (IFC)** that corresponds to each combination of TPU and IS. EPA has revised the 35 IFC descriptions and codes.*

**Note that when the “Other” code is selected for IS or IFC, you must provide a written description.*

Codes for Type of Processing or Use (TPU)

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

Form U, Part III.A – Additional Information

Section A. Industrial Processing and Use Information: % PV

- Report the estimated percentage of total 2015 production volume that corresponds to each unique combination of TPU, IS, and IFC:
 - Step 1:** Determine the Production Volume attributable to each unique combination of TPU, IS, and IFC.
 - Step 2:** Determine your Total Production Volume for 2015:
 - a. Add together the volume domestically manufactured and the volume imported.
 - b. DO NOT subtract the volume used on-site or directly exported.
 - Step 3:** Divide the volume determined in Step 1 by the volume determined in Step 2 and multiply by 100.
- Round estimates to the nearest 10% of production volume:
 - For estimates of production volumes of 0–5% that correspond to $\geq 25,000$ lbs, report production volumes to the nearest 1%.
 - Total % PVs may add up to more or less than 100% due to rounding.

Form U, Part III.A – Additional Information

Number of Sites

Report the **total number of industrial sites in 2015** that processed or used the chemical substance corresponding to each unique combination of TPU, IS, and IFC.

If the chemical substance is both manufactured (including imported) and processed/used at the site, report the site in both Part II (Section 2.B) and Part III (Section 3.A).

Code	Number of Sites (z)
S1	$z < 10$
S2	$10 \leq z < 25$
S3	$25 \leq z < 100$
S4	$100 \leq z < 250$
S5	$250 \leq z < 1,000$
S6	$1,000 \leq z < 10,000$
S7	$z \geq 10,000$

Number of Workers

Report the **total number of workers that were reasonably likely to be exposed in 2015** to the chemical substance at sites that process or use the substance, corresponding to each unique combination of TPU, IS, and IFC.

Code	Number of Workers (x) Reasonably Likely to be Exposed
W1	$x < 10$
W2	$10 \leq x < 25$
W3	$25 \leq x < 50$
W4	$50 \leq x < 100$
W5	$100 \leq x < 500$
W6	$500 \leq x < 1,000$
W7	$1,000 \leq x < 10,000$
W8	$x \geq 10,000$

FORM U, PART III.B – ADDITIONAL INFORMATION

Section B. Consumer and Commercial Use Information

- Designate up to 10 **Product Categories** which correspond to the actual use of the chemical substance in 2015:
 - Use the appropriate code from the drop-down list. EPA has updated the list of 33 product category codes.
 - When the “Other” code is selected, you must provide a written description.
- For each product category, indicate whether the product had a **consumer use, a commercial use, or both** by selecting from the drop-down list.
- For each product category, indicate whether it has been used in products **intended for use by children**. *(See next slide)*
 - Select “Y,” “N,” or “NKRA.”

FORM U, PART III.B – ADDITIONAL INFORMATION

Section B. Consumer and Commercial Use Information for 2015: Use in Products Intended for Use by Children

- Within each product category you report, you must determine whether any amount of each reportable chemical substance was present in or on any consumer product(s) intended for use by children in 2015:
 - ***Intended for use by children*** means the chemical substance or mixture is used in or on a product that is specifically intended for use by children age 14 and younger. (40 CFR 711.3)
- Your chemical substance or mixture is intended for use by children if you answer “**Yes**” to at least **one** of the following questions about the product into which your chemical substance or mixture is incorporated:
 - Is the product commonly recognized (i.e., by a reasonable person) as being intended for use by children age 14 or younger?
 - 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?
 - Is the advertising, promotion, or marketing of the product aimed at children age 14 or younger?

Form U, Part III.B – Additional Information

Section B. Consumer and Commercial Use Information: % PV

- Report the estimated percentage of total 2015 production volume that corresponds to each Product Category:
 - Step 1:** Determine the Production Volume attributable to each consumer and commercial end use.
 - Step 2:** Determine your Total Production Volume for 2015:
 - a. Add together the volume domestically manufactured and the volume imported.
 - b. DO NOT subtract the volume used on-site or directly exported.
 - Step 3:** Divide the volume determined in Step 1 by the volume determined in Step 2 and multiply by 100.
- Round estimates to the nearest 10% of production volume:
 - For estimates of production volumes of 0–5% that correspond to $\geq 25,000$ lbs, report production volumes to the nearest 1%.
 - Total % PVs may add up to more or less than 100% due to rounding.

FORM U, PART III.B – ADDITIONAL INFORMATION

Section B. Consumer and Commercial Use in 2015

Maximum concentration, by weight, of chemical substance used in each commercial or consumer product.

–Select code from list below.

Code	Maximum Concentration (y) in Weight Percent
M1	$y < 1\%$
M2	$1\% \leq y < 30\%$
M3	$30\% \leq y < 60\%$
M4	$60\% \leq y < 90\%$
M5	$y \geq 90\%$

= A

Total number of commercial workers that were reasonably likely to be exposed while using the chemical substance for each commercial use.

– Select code from list below.

Code	Number of Workers (x) Reasonably Likely to be Exposed
W1	$x < 10$
W2	$10 \leq x < 25$
W3	$25 \leq x < 50$
W4	$50 \leq x < 100$
W5	$100 \leq x < 500$
W6	$500 \leq x < 1,000$
W7	$1,000 \leq x < 10,000$
W8	$x \geq 10,000$

COMPLETING FORM U

Once Form U is completed and validated, the **Authorized Official must certify, sign, and submit** the form electronically to EPA.

For instructions on how to electronically complete and submit Form U, see:

Module 4: Registering with CDX for CDR Reporting

Module 5: Using the e-CDRweb Reporting Tool

TRAINING MODULES FOR CDR RULE

There are seven Training Modules for the CDR rule. The Training Module you have just completed is highlighted below in the list of all seven Training Modules. Select another Training Module if you wish to continue your review of the CDR.

Module 1: New Requirements for 2016 Chemical Data Reporting

Module 2: Reporting Requirements for the 2016 Chemical Data Reporting

Module 3: Completing Form U for 2016 Chemical Data Reporting

Module 4: Registering with CDX for Chemical Data Reporting

Module 5: Using the e-CDRweb Reporting Tool

Module 6: CDR Joint Submissions for Chemical Data Reporting

Module 7: Byproducts and Chemical Data Reporting