NOC2018P1

Form Approved. O.M.B. No. 2070-0012

CBI SUBMISSION

EPA U.S. Environmental Protection Agency NOTICE OF COMMENCEMENT OF MANUFACTURE OR IMPORT (40CFR§720.102)

Report Number

Part I - SUBMITTER IDENTIFICATION

Document Control #:

	Name of Authorized Official	Mailing Address (number and street)			CBI*
Manu-facturer/ Importer (in U.S.)	(first) Yuko (last) Ueda	1280 N. MATHILDA AVE			
	Company Name	City	State	Zip	
	JSR MICRO, INC.	SUNNYVALE	CA	94089	
Technical Contact (in U.S.)	Name	Telephone Number			
	(first) See Continuation (last) Page for list of	Contact Information			

Part II - Premanufacture Notice (PMN) "P" Case Number: P-18-0147

Part III - Check the appropriate box and provide the exact date of manufacture or importation:

	First Commercial Manufacture**	X	First Commercial Importation***
Date:		Date:	11/29/2018

**Date of commencement is the date of completion of non-exempt manufacture of the first amount (bath, drum, etc.)
***For importees, the date of commencement is the date that the new chemical substance clears U.S. customs.

Part IV - Manufacturing Plant Site(s) or Importing Site(s): (Importers, provide street address of destination)

JSR MICRO, INC.
1280 N. MATHILDA AVE
SUNNYVALE, CA 94089

Part V - Specific Chemical Identity: (For Consolidated submissions, each substance must have a separate NOC form with the specific identity of each chemical substance.)

Chemical Name: [redacted]

CASRN:

X

Part VI - Generic Chemical Name (if chemical identity is claimed CBI*):

Phenol, 4-ethenyl-, 1-substituted, polymer with 1-(1,1-substituted)-4-ethenylbenzene and ethenylbenzene, 2, 2'-(1,2-diazenediyl)bis[2-substituted]-initiated, hydrolyzed

Continuation Sheet

ID	TechContact1	Field	Technical Contact Information

Robert Bonderer 4085438813
Keri Morales 4085438860

Part VII - Substance Identity Confidentiality Status:

X	I wish to continue to claim the substance identity confidential and the substantiation to support this claim is attached. Failure to submit the required substantiation in accordance with 40 CFR 720.85(b) will result in a waiver of your claim.
	I previously claimed the substance identity as confidential and hereby relinquish that claim.
	I did not claim the substance identity as confidential in my original PMN submission.

The public reporting and recordkeeping burden for this collection of information is estimated to average 0.8 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed EPA Form 7710-56 to this address.

You must submit your completed notice no later than 30 calendar days after the first date of commercial manufacture/importation to the address shown below:

U.S. Environmental Protection Agency
OPPT Document Control Office (7407M)
1200 Pennsylvania Ave., NW
Washington, D.C. 20460
ATTN: Notice of Commencement

I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate.
I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for protection for any confidential information made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that the person submitting the claim has:

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

Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.

Signature of authorized official	ES/Yuko Ueda	Date	12/13/2018

Note: CBI* - refers to the term "Confidential Business Information". Mark (X) in the box if the information is to be held Confidential.

CBI Substantiation

(A) What harmful effects to your competitive position, if any, do you think would result if EPA publishes on the Inventory the identity of the chemical substance? How could a competitor use such information given the fact that the identity of the substance otherwise would appear on the Inventory of chemical substances with no link between the substance and your company or industry? How substantial would the harmful effects of disclosure be? What is the causal relationship between the disclosure and the harmful effects?

[redacted]

(B) For what period of time should confidential treatment be given? Until a specific date, the occurrence of a specific event, or permanently? Why?

[redacted]

(C) 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 for purposes of the Inventory?

[redacted]

(D) 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?

[redacted]

(E) Is the fact that someone is manufacturing or importing this chemical substance for commercial purposes available to the public, e.g. in technical journals or other publications; in libraries; or in State, local, or Federal agency public files?

[redacted]

(F) What measures have you taken to prevent undesired disclosure of the fact that you are manufacturing or importing this substance for a commercial purpose?

[redacted]

(G) To what extent has the fact that you are manufacturing or importing this chemical substance for a commercial purpose been disclosed to others? What precautions have you taken in regard to these disclosures? Has this

information been disclosed to the public or to competitors?

[redacted]

(H) In what form does this particular chemical substance leave the site of manufacture, e.g., as part of a product; in effluent or emission stream? If so, what measures have you taken to guard against discovery of its identity?

[redacted]

(I) If the chemical substance leaves the site of manufacture in a product that is available to either the public or your competitors, can they identify the substance by analyzing the product?

[redacted]

(J) For what purpose do you manufacture or import the substance?

[redacted]

(K) Has EPA, another Federal agency, or any Federal court made any persistent confidentiality determinations regarding this chemical substance? If so, copies of such determinations must be included in the substantiation.

[redacted]

(L) If the notice includes a health and safety study concerning the new chemical substance, the submitter must also answer the questions in 40 CFR 720.90(b)(2). (Persons must answer this question if a health and safety study was provided at any time in the new chemical process.)

[redacted]