

Guidance and Instructions for Reporting Asbestos Under TSCA Section 8(a)(1)

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HIGHLIGHTS OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR ASBESTOS UNDER TSCA 8(a)(1)

- One-time reporting is required for manufacturers (including importers) or processors of asbestos—including naturally occurring asbestos and asbestos present in mixtures, articles, and as an impurity—in the last four calendar years prior to the effective date of the final rule—August 24, 2023 (i.e., 2019, 2020, 2021, and 2022)
- The only small business exemption in effect for this data call applies to small manufacturers (including importers) and small processors of Libby Amphibole asbestos. **You may be required to report under this rule even if you are not required to report under other TSCA requirements, such as CDR, due to a small business exemption.**
- You may be exempt from reporting if you manufacture (including import) or process asbestos only in small quantities for research and development.
- Information must be reported during the three-month data submission period (40 CFR 704.180(f)) beginning February 24, 2024 and ending May 24, 2024.
- All reporting companies must report data electronically, using the section 8(a)(1) web-based reporting tool within EPA’s Central Data Exchange (CDX) system. Prior to submitting data, submitters must register with CDX. Ensure that your pop-up blocker is disabled before you begin to use the asbestos section 8(a)(1) tool to complete your form.
- Reduced reporting requirements apply to reporters who know or can reasonably ascertain that asbestos is a component of a mixture or article but are unable to determine the asbestos quantity by weight.
- Information submitted under this data call may be claimed as confidential; however, such claims must be made at the time of submission and substantiated in accordance with TSCA and the asbestos data reporting rule. Submitters must provide upfront substantiation of all confidentiality claims except for claims made for quantities of products or asbestos, which are exempt from substantiation requirements. Certain processing and use data elements or a response that is designated as “not known or reasonably ascertainable” may not be claimed as confidential (40 CFR 704.180(h)(1)(ii)(C)).
- Visit the section 8(a)(1) rule website (<https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/tsca-section-8a1-reporting-and-recordkeeping>) for other guidance materials and contact information for technical assistance.

TABLE OF CONTENTS

1. Introduction	1-4
2. Reporting Requirements	2-4
2.1 Step 1: Is Your Chemical Substance Subject to Section 8(a)(1)?.....	2-5
2.1.1 Is Your Chemical Substance Manufactured or Processed for Commercial Purposes During the Reporting Period?	2-5
2.1.2 Were your annual sales, when combined with those of your ultimate parent company (if any), greater than or equal to \$500,000 in any calendar year from 2019 to 2022?	2-6
2.2 Step 2: Do You Qualify for an Exemption or Reduced Reporting?	2-6
2.2.1 Do you qualify for a small manufacturer or small processor exemption? ...	2-6
2.2.2 Do you qualify for a Research and Development (R&D) exemption?	2-7
2.2.3 Do you qualify for the Non-isolated Intermediate exemption?.....	2-7
2.2.4 Form A with Reduced Reporting Requirements	2-8
2.3 Step 3: What Information Must You Report?.....	2-11
3. When You Must Report	3-1
4. Instructions for Completing Asbestos section 8(a)(1) Reporting	4-1
4.1 Known to or Reasonably Ascertainable by Reporting Standard	4-1
4.2 Confidential Business Information (CBI) and Substantiation	4-4
4.2.1 Exemptions	4-5
4.3 Company and site information.....	4-5
4.3.1 Confidentiality of Company, Site, and Technical Contact Information.....	4-5
4.3.2 Special Provisions for Certain Sites	4-6
4.3.3 Parent Company Information	4-7
4.4 Asbestos Fibers	4-12
4.5 Reporting Activity Information	4-12
4.5.1 Confidentiality of Activity Information	4-13
4.5.2 Mined, milled, or imported bulk asbestos or bulk materials containing asbestos, including as an impurity.....	4-14
4.5.3 Primary processors.....	4-15
4.5.4 Secondary processors	4-21
4.5.5 Importing of mixtures, or articles containing asbestos, including as an impurity	4-22
4.5.6 Employee information	4-24
4.6 Certification	4-25
5. How to Obtain Copies of Documents Cited in This Instructions Document	5-25
5.1 Obtaining Copies of the TSCA Rules.....	5-25
5.2 Obtaining Copies of Other Information Materials.....	5-25
Appendix A. Glossary of Terms	1
Appendix B. Descriptions of Codes for Reporting Number of Employees, Asbestos Type, Disposition, Product Type	1

APPENDICES

Appendix A. Glossary of Terms A-1
Appendix B. Descriptions of Codes for Reporting Number of Employees, Asbestos Type, Disposition, Product Type B-1

LIST OF TABLES

Table 2-1. Example Determination for Use of Form A or Form B..... 2-8
Table 2-2. Information to be Reported on Forms A and B 2-11
Table 4-1. Examples of the Application of the "Known to or Reasonably Ascertainable by" Reporting Standard for Processing and Use Data 4-3
Table 4-2. CBI Substantiation Questions..... 4-4
Table 4-3. Applying Highest-level Parent Company Definition in Different Situations 4-7
Table 4-4. Parent Company Name Standardization 4-8
Table 4-5. Parent Company Street Address Standardization..... 4-9
Table 4-6. Codes for Number of Employees..... 4-11
Table 4-7. Asbestos Types..... 4-12
Table 4-8. Substantiation Questions for Activity Information 4-13
Table 4-9. Disposition Codes..... 4-14
Table 4-10. End Product Types..... 4-16
Table B-1. Codes for Number of Employees..... 1
Table B-2. Asbestos Types..... 1
Table B-3. Disposition Codes..... 2
Table B-4. End Product Types 2

PREFACE

The primary goal of this document is to help the regulated community comply with the requirements of the TSCA Section 8(a)(1) *Reporting and Recordkeeping Requirements for Asbestos* rule, hereafter referred to as “asbestos section 8(a)(1) reporting”. This document does not substitute for that rule, nor is this a rule itself. This document does not impose legally binding requirements on the regulated community or on the U.S. Environmental Protection Agency (EPA).

Manufacturers (including importers) and processors are required by the asbestos section 8(a)(1) reporting rule to report certain exposure-related information to EPA, including quantities of asbestos manufactured (including imported) or processed, types of use, and employee data. Manufacturers (including importers) and processors are subject to the reporting requirements based on manufacturing (including importing) and processing activities conducted between January 1, 2019 and December 31, 2022. This is a one-time reporting event to inform EPA’s risk evaluation for asbestos and potential future risk management activities. This data collection is authorized under TSCA section 8(a).

Data submissions are due by the close of the submission period, May 24, 2024. The submission period will begin on February 24 2024, six months following the effective date of the final rule and remain open for three months through May 24, 2024. Data must be submitted using the “Asbestos 8(a)(1)” web service via EPA’s Central Data Exchange (CDX). Submitters are required to use the Asbestos 8(a)(1) web service to prepare their submissions. The web-based reporting tool guides users through a “hands-on” process of creating an electronic submission.

This instructions document contains the following chapters and appendices:

- Chapter 1 - Introduction to the TSCA asbestos section 8(a)(1) reporting rule.
- Chapter 2 - Reporting requirements to determine which chemical substances are reportable, who must report, and what information must be reported.
- Chapter 3 - When you must report.
- Chapter 4 - Instructions for completing asbestos section 8(a)(1) reporting.
- Chapter 5 - How to obtain copies of documents cited in this Guidance and Instructions document.
- Appendix A - Glossary.
- Appendix B - Descriptions of codes for reporting *Number of Employees, Asbestos Type, Disposition, and End Product Types*.

1. Introduction

EPA is requiring persons that manufactured (including imported) or processed asbestos and asbestos-containing mixtures and articles in any year from January 1, 2019 – December 31, 2022, to submit certain exposure-related information to EPA.

This document provides detailed information and examples to assist manufacturers (including importers) and processors in reporting under TSCA section 8(a)(1).

Appendix A of this document provides a glossary of terms, which may help you to understand the reporting requirements. Appendix B of this document provides a copy of all codes used for reporting.

This document is not a substitute for the TSCA asbestos section 8(a)(1) rule in 40 CFR Part 704.180. To the extent that any inconsistencies exist between the asbestos section 8(a)(1) rule and this document, the requirements as promulgated in the rule should be followed. You should carefully review 40 CFR Part 704.180 and the final rule preamble (available in this rule’s docket at www.regulations.gov; docket ID EPA-HQ-OPPT-2021-0357) to determine whether you are required to report information under the asbestos section 8(a)(1) rule.

2. Reporting Requirements

Asbestos reporting requirements apply to certain persons that manufactured (including imported) or processed asbestos in any year since January 1, 2019. The term asbestos is defined in Appendix A. Please note that any use of the term “manufacture” in this document will encompass “import” and the term “manufacturer” will encompass “importer.”

For reporting under the asbestos section 8(a)(1) data reporting rule, manufacturers (including importers) and processors are required to use the section 8(a)(1) reporting tool via EPA’s CDX to submit information in response to the requirements of the asbestos section 8(a)(1) rule (40 CFR Part 704). You must register with CDX to submit online, and you must register the name of the company on whose behalf you are submitting. EPA does not accept paper submissions or electronic media (diskette, CD-ROM, etc.) for any section 8(a)(1) submission (40 CFR 704).

You should consider the following three steps to determine whether you are required to report for asbestos that you domestically manufacture (including import) or process in the United States **during each year since 2019** (i.e., consider calendar years 2019 through 2022):

- Step 1: Is your chemical substance subject to 8(a)(1)?
- Step 2: Do you qualify for a reporting exemption?
- Step 3: What information must you report?

This chapter discusses each of these steps and the associated reporting requirements in more detail.

2.1 Step 1: Is Your Chemical Substance Subject to Section 8(a)(1)?

2.1.1 Is Your Chemical Substance Manufactured or Processed for Commercial Purposes During the Reporting Period?

The first step in determining your reporting requirements is to determine whether you meet the definition of manufacture or process for commercial purposes. These terms are defined in 40 CFR 704.3 and below:

Manufacture for commercial purposes means:

(1) to import, produce, or manufacture with the purpose of obtaining an immediate or eventual commercial advantage for the manufacturer, and includes among other things, such “manufacture” of any amount of a chemical substance or mixture:

(i) For commercial distribution, including for test marketing.

(ii) For use by the manufacturer, including use for product research and development, or as an intermediate.

(2) Manufacture for commercial purposes also applies to substances that are produced coincidentally during the manufacture, processing, use, or disposal of another substance or mixture, including both byproducts that are separated from that other substance or mixture and impurities that remain in that substance or mixture. Such byproducts and impurities may, or may not, in themselves have commercial value. They are nonetheless produced for the purpose of obtaining a commercial advantage since they are part of the manufacture of a chemical product for a commercial purpose. (40 CFR 704.3)

Process for commercial purposes means the preparation of a chemical substance or mixture after its manufacture for distribution in commerce with the purpose of obtaining an immediate or eventual commercial advantage for the processor. Processing of any amount of a chemical substance or mixture is included in this definition. If a chemical substance or mixture containing impurities is processed for commercial purposes, then the impurities also are processed for commercial purposes. (40 CFR 704.3)

For purposes of section 8(a)(1) reporting, a chemical substance is manufactured only if it is domestically produced or imported for commercial purposes.

2.1.1.1 Changes to Company Ownership or Legal Identity

Under 40 CFR 704.180(c), the reporting obligation falls to the person who manufactured (including imported) or processed asbestos in bulk form, in an article and/or product, as an impurity, or as a component of a mixture. EPA recognizes that in some cases, business transactions occurring during the submission period have led to questions about who is now the “person who manufactured or processed.” The scenarios in [Fact Sheet: Reporting After Changes to Company Ownership or Legal Identity](#) are intended to serve as a general aid in appropriately resolving these questions, but they will not necessarily account for all the relevant circumstances of a particular transaction (*note that while this fact sheet was developed for TSCA Chemical Data Reporting (CDR), changes in company ownership or legal identity are to be handled the same way for section 8(a)(1) reporting*). It is ultimately the manufacturer’s responsibility to report appropriately under this data call, notwithstanding the complexity of its own business transactions.

2.1.2 Were your annual sales, when combined with those of your ultimate parent company (if any), greater than or equal to \$500,000 in any calendar year from 2019 to 2022?

Under 40 CFR 704.180(c), Persons (*i.e.*, plant sites) who have manufactured (including imported), or processed asbestos, including asbestos as a component of a mixture, asbestos in articles, or asbestos as an impurity in the four full calendar years prior to the effective date of this rule, and with annual sales greater than or equal to \$500,000, in any calendar year from 2019 to 2022, when combined with those of their ultimate parent company (if any), must report under this subpart.

2.2 Step 2: Do You Qualify for an Exemption or Reduced Reporting?

Limited exemptions are available for TSCA asbestos section 8(a)(1) reporting. You may be required to report under this section even if you are exempt from other TSCA reporting rules, such as Chemical Data Reporting Rule (CDR). Reporting under the TSCA asbestos 8(a)(1) rule is separate from other TSCA reporting requirements and only the exemptions specifically listed in the apply. The following subsections explain the exemptions and reduced reporting requirements:

- Small manufacturers (including importers) and processors exemption for Libby Amphibole asbestos only;
- Research and development exemption;
- Non-isolated intermediates exemption; and
- Short form (Form A) with reduced reporting requirements.

2.2.1 Do you qualify for a small manufacturer or small processor exemption?

If your business is a small manufacturer or processor of Libby Amphibole asbestos, you may not be required to report on Libby Amphibole under asbestos section 8(a)(1). The definitions of small manufacturer and small processor are provided below. For purposes of the definition of a small manufacturer, total annual sales include all sales of the company (including parent company(ies)), not just the total sales of a given chemical substance. **The small manufacturer or processor exemption applies only to Libby Amphibole asbestos.** If you manufacture or process any other form(s) of asbestos, you must report for those form(s) of asbestos even if you meet the definition of small manufacturer or processor. Key terms are defined in 40 CFR 704.3 and below:

Small manufacturer (the same standard will be used for all manufacturers):

First standard. A manufacturer (including importer) of a substance is small if its total annual sales, when combined with those of its parent company (if any), are less than \$120 million. However, if the annual production or importation volume of a particular substance at any individual site owned or controlled by the manufacturer or importer is greater than 45,400 kilograms (100,000 lbs), the manufacturer (including importer) will not qualify as small for purposes of reporting on the production or importation of that substance at that site, unless the manufacturer (including importer) qualifies as small under standard (2) of this definition.

Second standard. A manufacturer (including importer) of a substance is small if its total annual sales, when combined with those of its parent company (if any), are less than \$12 million,

regardless of the quantity of substances produced or imported by that manufacturer (including importer).

Small processor means any processor whose total annual sales, when combined with those of its parent company (if any), are less than \$12 million.

If you have determined that you are a small manufacturer or small processor that is manufacturing or processing only Libby Amphibole, you do not need to report under asbestos section 8(a)(1).

If you do not qualify for a small manufacturer or small processor exemption, evaluate whether you qualify for another reporting exemption or whether you may report on Form A, which requires less information from you.

2.2.2 Do you qualify for a Research and Development (R&D) exemption?

EPA is not requiring recordkeeping or reporting by persons who manufacture (including import) or process asbestos in small quantities solely for research and development. If you manufacture or process asbestos solely for research or analysis for the development of a product, review the definitions below to determine whether you qualify for an R&D exemption. This exemption applies only if research and development is the sole use of asbestos in manufacturing or processing asbestos at your facility.

TSCA section 8(a)(1)(A) excludes from the scope of EPA's regulatory authority any manufacturer (including importer) or processor of "a chemical substance described in subparagraph (B)(ii)." TSCA section 8(a)(1)(B)(ii), in turn, provides EPA authority to require recordkeeping and reporting by each person (other than a small manufacturer [including importer] or processor) who manufactures (including imports) or processes, or proposes to manufacture (including import) or process, a chemical substance "in small quantities...solely for purposes of scientific experimentation or analysis or chemical research on, or analysis of, such substance or another substance, including any such research or analysis for the development of a product," but only to the extent EPA determines the recordkeeping and/or reporting is necessary for the effective enforcement of TSCA. EPA is not requiring recordkeeping or reporting by persons who manufacture (including import) or process—or propose to manufacture (including import) or process—asbestos in small quantities solely for research or analysis for the development of a product as described in TSCA section 8(a)(1)(B)(ii). The regulatory definition for small quantities (40 CFR 704.3) is provided below:

Small quantities solely for research and development means quantities of a chemical substance manufactured, imported, or processed or proposed to be manufactured, imported, or processed solely for research and development that are not greater than reasonably necessary for such purposes.

2.2.3 Do you qualify for the Non-isolated Intermediate exemption?

If you manufactured or processed asbestos solely as a non-isolated intermediate, you are not required to report under Section 8(a)(1). However, if you believe you may manufacture or process asbestos solely as a non-isolated intermediate, review the definitions of "non-isolated intermediate" and "intermediate" below to determine if you are exempt from reporting.

Non-isolated intermediate means any intermediate that is not intentionally removed from the equipment in which it is manufactured, including the reaction vessel in which it is manufactured, equipment which is ancillary to the reaction vessel, and any equipment through

which the substance passes during a continuous flow process, but not including tanks or other vessels in which the substance is stored after its manufacture. (40 CFR 704.3)

Intermediate means any chemical substance that is consumed, in whole or in part, in chemical reactions used for the intentional manufacture of other chemical substances or mixtures, or that is intentionally present for the purpose of altering the rates of such chemical reactions. (40 CFR 704.3)

2.2.4 Form A with Reduced Reporting Requirements

If you do not qualify for a reporting exemption, consider whether you may qualify to report by using data fields corresponding to the short form, Form A, rather than the standard form, Form B. The Asbestos 8(a)(1) reporting software will assist you in selecting and completing the correct data fields.

Entities that are aware of asbestos present in their product, but who are unable to determine or estimate the quantity manufactured (including imported) or processed, will use the Form A option to provide a subset of the information required by the Form B. This subset consists of information related to manufacturing (including importing) or processing asbestos, including as an impurity, in an article, or as a component of a mixture, and information about the employees involved with such activities.

EPA requires that if a quantity of asbestos in a product is known to or reasonably ascertainable by the submitter, then the submitter must provide the more detailed reporting information required by Form B.

Form A. Report using the Form A option if you know or can reasonably ascertain that asbestos is a component of a mixture or article but are unable to determine the asbestos quantity by weight after exhausting all reasonable efforts to obtain or calculate the asbestos concentration or quantity. For more on TSCA definition of the term “reasonably ascertainable,” see Section 4.1.

Form B. Report using the Form B option if you know or can reasonably ascertain a quantity for asbestos as a component or as an impurity.

Table 2-1. Example Determination for Use of Form A or Form B

Scenario	Result
Company A imports an article containing asbestos. Company A contacts their supplier, who provides an estimate of the asbestos percentage by weight in the product.	Company A uses Form B to report because they can make a reasonable estimate of the quantity of asbestos they imported.
Company B processes a mixture containing asbestos. Despite contacting their supplier and reviewing product information sheets and Safety Data Sheets (SDSs), company B is unable to determine the amount of asbestos in the mixture.	Company B uses Form A to report because they do not know and cannot reasonably ascertain the quantity of asbestos they processed.
Company C imports brake pads. Internal testing shows the imported brake pads contain approximately 30% asbestos.	Company C uses Form B to report because they can make a reasonable estimate of the quantity of asbestos they imported.
Company D imports mufflers and transmissions and knows that both products contain asbestos. Company D knows the asbestos content of the mufflers. Despite	Company D uses Form B to report for the mufflers because they know the quantity of asbestos imported in the mufflers. Company D uses Form A to report for the

Scenario	Result
contacting their supplier and reviewing their product information, Company D is unable to determine the asbestos content of the transmissions.	transmissions because they are unable to ascertain the quantity of asbestos they imported in the transmissions.

Figure 2-1 presents a decision diagram that may help you determine whether you are a manufacturer (including importer) or processor who must report with the standard form, Form B or if you may qualify for an exemption or to use the short form, Form A.

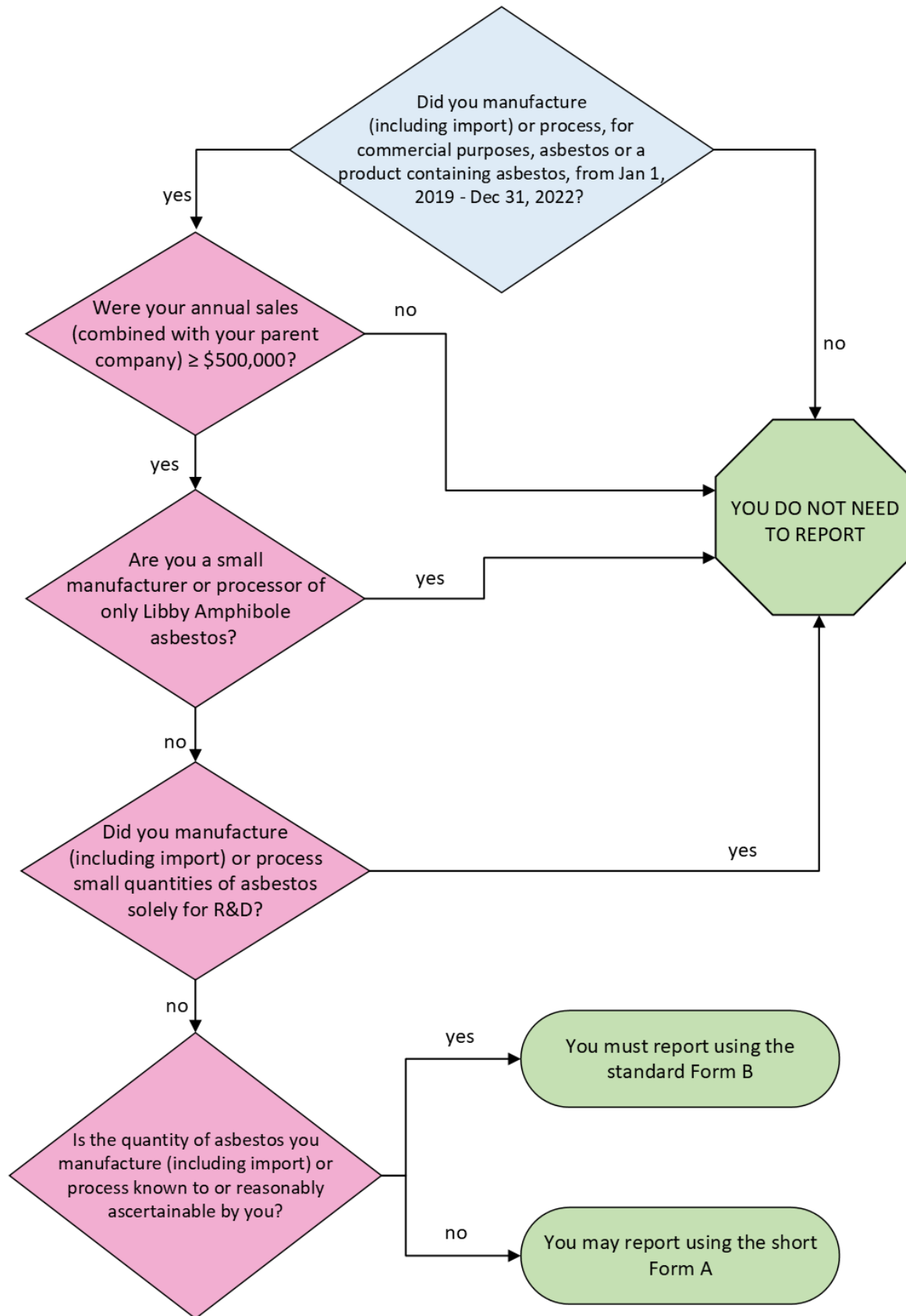


Figure 2-1. Decision Diagram for Evaluating Step 2 [40 CFR 704.180(c)]

2.3 Step 3: What Information Must You Report?

If you determine from Step 1 (Section 2.1) and Step 2 (Section 2.2) that you are required to report, this section will help you determine what information you must report. If you are able to determine the quantity of asbestos you manufactured or processed, you must use the data elements of the full reporting form, Form B. If you are unable to determine the quantity of asbestos you manufactured or processed, you may use the data elements of the short form, Form A. See Section 2.2.4 of this document for a detailed discussion of reporting exemptions and determination of which form to use.

If you are reporting using Form A, you are not required to report all information required for Form B. The online reporting software will guide you through the data elements required for each form.

In most cases, each manufacturer or processor will submit only one form. However, if you are able to determine the asbestos content of some products manufactured (including imported) or processed at your facility, you may report using one Form B for the items with known asbestos content and one Form A for the items with unknown asbestos content. If you are reporting on behalf of multiple sites, you must create a profile for each site in your CDX account.

Basic company and site identification information is required for all reporters by 40 CFR 711.15(b)(1) and (b)(2). Asbestos manufacturing, import, or processing activity information is required for all reporters by 40 CFR 704.180, with certain more detailed information required only for Form B. Information about employees involved in asbestos manufacturing or import is required for all reporters by 40 CFR 704.180.

Table 2-2. Information to be Reported on Forms A and B

Company Information	
Site Name and Address, ID numbers	
Authorized Official	
Technical Contact	
Parent Company Name, Address	
Site NAICS Code	
Number of Employees	
Activity Information - All Forms	Activity Information - Form B Only
Activities conducted	Quantity of asbestos manufactured/processed
Asbestos types	Disposition of asbestos
Bulk material or product types	Bulk material/product quantity
Bulk material or product disposition	Bulk material/product asbestos concentration
Annual production quantity*	Bulk material/product asbestos type
Imported asbestos never on site*	Bulk material/product testing
Number of employees involved	Workplace exposure data
Personal Protective Equipment	

*Certain activity types only

3. When You Must Report

You are required to report information pertaining to each calendar year since January 1, 2019 through December 31, 2022. The submission period is from February 24, 2024 to May 24, 2024, a three-month period which begins six months after the effective date of the asbestos section 8(a)(1) final rule.

Your report must be submitted to EPA using the electronic asbestos section 8(a)(1) reporting tool via EPA's Central Data Exchange (CDX) no later than the close of the submission period. You should note that registration with CDX is required prior to accessing the online asbestos section 8(a)(1) tool to submit your information. To get you started, a CDX guide is available on EPA's website:

- CDX Registration Guide, which covers the specifics of CDX registration (<https://cdx.epa.gov/About/UserGuide>)

If you are required to report, failure to file your report during this period is a violation of TSCA sections 8(a) and 15 and may subject you to penalties (See 40 CFR 711.1(c)).

4. Instructions for Completing Asbestos section 8(a)(1) Reporting

This chapter will help you complete asbestos section 8(a)(1) reporting. Section **Error! Reference source not found.** describes how to certify your submission. Section 4.1 discusses the reporting standard – the effort required to comply with the asbestos section 8(a)(1) reporting rule. Sections 4.2 through Section 0 provide information to help you complete each required section of the reporting form.

You are required to use the section 8(a)(1) online reporting tool in CDX to complete and submit your asbestos section 8(a)(1) form. If you are reporting for multiple sites, you must submit separate forms for each site. In most cases, you will submit exactly one form per site. However, in certain cases you may submit one Form A and one Form B for one site; see Section 2.2.4 for a discussion of when to report using Form A or Form B.

The standard reporting form is comprised of a certification statement and two parts, as follows:

- The certification statement and Part I of the form are completed once per reporting site. Part I contains company and site information, as well as contact information for the Authorized Official and the technical contact.
- Part II is completed for each type of activity occurring at the site. It contains information on the type and quantity of asbestos mined, milled, processed, or imported, and the disposition of the material or product as well as employee information including information on the number of employees, type(s) of personal protective equipment (PPE) used, and assessments of workplace exposure.

Form A reduces the number of fields to be reported for reporters who do not know the quantity of asbestos they manufactured (including imported) or processed.

Note: Items such as the validation page and the SRS search page will appear in separate windows. Ensure that your pop-up blocker is disabled before you begin to complete asbestos section 8(a)(1) reporting.

4.1 Known to or Reasonably Ascertainable by Reporting Standard

Submitters are required to exercise certain levels of due diligence in gathering the information required by the asbestos section 8(a)(1) rule. You must report your information to the extent that the information is **known to or reasonably ascertainable** (“KRA”) by you and your company.

The term “known to or reasonably ascertainable by” is defined in 40 CFR 704.3, meaning “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), EPA may collect information associated with chemical substances to the extent that it is known to or reasonably ascertainable by the submitter. This includes, but is not limited to, information that may be possessed by employees or other agents of the company reporting under the section 8(a)(1) rule, including persons involved in the research, development, manufacturing, or marketing of a chemical substance and includes

knowledge gained through discussions, symposia, and technical publications. For purposes of section 8(a)(1), the known to or reasonably ascertainable by standard applies to all the information required by the rule.

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 include:

- Files maintained by the manufacturer, such as marketing studies, sales reports, or customer surveys,
- Information contained in standard references, such as a safety data sheet (SDS) or a supplier notification, and
- Information from the Chemical Abstracts Service (CAS) and from Dun & Bradstreet D-U-N-S®.

In the event that a manufacturer (including importer) or processor does not have actual data (*e.g.*, measurements or monitoring data) to report to EPA, the manufacturer (including importer) or processor is required to make "reasonable estimates" of such information. "Reasonable estimates" may rely, for example, on approaches such as mass balance calculations, emissions factors, or best engineering judgment.

As noted in EPA's existing guidance on the KRA standard under the CDR rule, information included in an SDS is an example of information that may be 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 (see: https://www.epa.gov/sites/default/files/2020-12/documents/instructions_for_reporting_2020_tasca_cdr_2020-11-25.pdf). Therefore, potentially affected entities with SDSs may consider the information included therein to determine any reporting obligations. However, if a reporting entity has information on manufactured (including imported) or processed asbestos that is known to or reasonably ascertainable by them beyond an SDS, the entity must report that information to EPA as applicable. In addition, if a material has physical properties characteristic of asbestos, or the facility has other knowledge, then the SDS line of evidence alone does not meet the due diligence standard. Further, because SDSs are not required for articles, the mere unavailability of an SDS on its own may be an insufficient basis to indicate that the article does not contain asbestos.

The hypothetical examples in Table 4-1 illustrate the anticipated application of the "known to or reasonably ascertainable" reporting standard, in the specific context of the collection of processing and use data under asbestos section 8(a)(1). Because the standard applies on a case-by case basis, however, these examples cannot substitute for a complete analysis of a submitter's particular circumstances.

This reporting standard does not confer a testing requirement on manufacturers. But, if manufacturers have previously tested their products for the presence of asbestos, then that information may be considered known to or reasonably ascertainable by them and should be submitted to EPA as appropriate.

Table 4-1. Examples of the Application of the "Known to or Reasonably Ascertainable by" Reporting Standard for Processing and Use Data

Scenarios, Actions, and Outcomes									
<p>Scenario: Company D discovers that it has no knowledge of how much asbestos is in imported brake pads. Company D has multiple suppliers, but it expects that it could estimate the total quantity of imported asbestos by contacting its largest supplier and asking that supplier how much asbestos is in the brake pads.</p> <p>Application of KRA Reporting Standard:</p> <table border="1"> <thead> <tr> <th>If:</th> <th>Then:</th> </tr> </thead> <tbody> <tr> <td>Company D contacts its largest supplier and reports on the basis of the data that the supplier was willing to provide.</td> <td>Duties Likely Fulfilled</td> </tr> <tr> <td>Company D did not endeavor to supplement the information it already knew.</td> <td>Duties Not Fulfilled</td> </tr> </tbody> </table>		If:	Then:	Company D contacts its largest supplier and reports on the basis of the data that the supplier was willing to provide.	Duties Likely Fulfilled	Company D did not endeavor to supplement the information it already knew.	Duties Not Fulfilled		
If:	Then:								
Company D contacts its largest supplier and reports on the basis of the data that the supplier was willing to provide.	Duties Likely Fulfilled								
Company D did not endeavor to supplement the information it already knew.	Duties Not Fulfilled								
<p>Scenario: Company E has never maintained information on the ultimate disposition of its asbestos waste managed in the U.S. by waste management contractors. However, it is typical for comparable manufacturers to collect such information as part of their reasonable business practices. Company E has multiple waste disposal contractors, but it expects that it could substantially fill this data gap by contacting the contractor that receives most of Company E's asbestos waste.</p> <p>Application of KRA Reporting Standard:</p> <table border="1"> <thead> <tr> <th>If:</th> <th>Then:</th> </tr> </thead> <tbody> <tr> <td>Company E contacts the contractor managing the majority of Company E's asbestos waste, and reports on the basis of the information provided by that contractor.</td> <td>Duties Likely Fulfilled</td> </tr> <tr> <td>Company E did not endeavor to supplement the information it already knew.</td> <td>Duties Not Fulfilled</td> </tr> </tbody> </table>		If:	Then:	Company E contacts the contractor managing the majority of Company E's asbestos waste, and reports on the basis of the information provided by that contractor.	Duties Likely Fulfilled	Company E did not endeavor to supplement the information it already knew.	Duties Not Fulfilled		
If:	Then:								
Company E contacts the contractor managing the majority of Company E's asbestos waste, and reports on the basis of the information provided by that contractor.	Duties Likely Fulfilled								
Company E did not endeavor to supplement the information it already knew.	Duties Not Fulfilled								
<p>Scenario: Company F imports marine caulk. In 2021, the company initiated one-time testing for asbestos in its imported products. The testing showed asbestos present at 0.1% by weight in Brand A of caulk and no asbestos present in caulk from other brands.</p> <p>Application of KRA Reporting Standard:</p> <table border="1"> <thead> <tr> <th>If:</th> <th>Then:</th> </tr> </thead> <tbody> <tr> <td>Company F contacts its suppliers and receives lot-by-lot analysis of the asbestos content of all caulk imported from 2019 through 2022.</td> <td>Company F reports based on actual asbestos content of the imported product. Duties Likely Fulfilled.</td> </tr> <tr> <td>Company F contacts Brand A but Brand A does not supply additional information about the asbestos content of its caulks.</td> <td>Company F estimates that all caulk purchased from Brand A from 2019-2022 contains 0.1% asbestos and other brands did not contain asbestos. Duties Likely Fulfilled.</td> </tr> <tr> <td>Company F does not contact Brand A and reports only on the basis of the imported lot found to contain asbestos.</td> <td>Duties Not Fulfilled. Because Company F knows some caulk imported from Brand A contains asbestos, Company F must make a reasonable estimate of the asbestos contained in the imported caulk.</td> </tr> </tbody> </table>		If:	Then:	Company F contacts its suppliers and receives lot-by-lot analysis of the asbestos content of all caulk imported from 2019 through 2022.	Company F reports based on actual asbestos content of the imported product. Duties Likely Fulfilled.	Company F contacts Brand A but Brand A does not supply additional information about the asbestos content of its caulks.	Company F estimates that all caulk purchased from Brand A from 2019-2022 contains 0.1% asbestos and other brands did not contain asbestos. Duties Likely Fulfilled.	Company F does not contact Brand A and reports only on the basis of the imported lot found to contain asbestos.	Duties Not Fulfilled. Because Company F knows some caulk imported from Brand A contains asbestos, Company F must make a reasonable estimate of the asbestos contained in the imported caulk.
If:	Then:								
Company F contacts its suppliers and receives lot-by-lot analysis of the asbestos content of all caulk imported from 2019 through 2022.	Company F reports based on actual asbestos content of the imported product. Duties Likely Fulfilled.								
Company F contacts Brand A but Brand A does not supply additional information about the asbestos content of its caulks.	Company F estimates that all caulk purchased from Brand A from 2019-2022 contains 0.1% asbestos and other brands did not contain asbestos. Duties Likely Fulfilled.								
Company F does not contact Brand A and reports only on the basis of the imported lot found to contain asbestos.	Duties Not Fulfilled. Because Company F knows some caulk imported from Brand A contains asbestos, Company F must make a reasonable estimate of the asbestos contained in the imported caulk.								

4.2 Confidential Business Information (CBI) and Substantiation

Certain information reported in the asbestos section 8(a)(1) Reporting Form A and Reporting Form B can be claimed as confidential if it is not already public information. Confidentiality claims require upfront substantiation unless otherwise specified.

To assert a confidentiality claim, check the appropriate confidential business information (CBI) box for the confidential data element(s). You will be prompted to complete the substantiation questions prior to certifying the form. A CBI box will not appear for fields that may not be claimed as confidential. Checking a CBI box automatically triggers the substantiation questions, except for fields specifically exempted from substantiation requirements in section 4.3.1. See Table 4-2 for substantiation questions. If you fail to substantiate your CBI claims in accordance with the statute and applicable rules, EPA may make the information claimed CBI available to the public without further notice to you. For additional information about how to answer CBI substantiation questions, visit www.epa.gov/tsc-cbi on the EPA website.

You may not claim the following data as confidential:

- Site NAICS code (see Section 4.3.3.4)
- The following chemical identities and bulk material forms:
 - Most specific asbestos type for bulk asbestos (see Section **Error! Reference source not found.**)
 - Bulk material type for bulk asbestos (see Section 4.5.2.1)
 - Asbestos type for each bulk material type (see Section 4.5.2.1)
 - Asbestos type and quantity for primary processors (see Section 4.5.3)
 - Asbestos type and quantity for secondary processors (see Section 4.5.4)
 - Asbestos type for imported products (see Section 4.5.5.2)
- Data elements left blank or designated as “not known or reasonably ascertainable”
- Workplace exposure measurement assessments and data (see Section 4.5.6.3), except:
 - Information that would reveal processing information or the portion of a mixture
 - Company name or address, financial statistics, and product codes used by a company and contained in a study
 - Other company information which is contained in a study and for which disclosure would clearly be an unwarranted invasion of personal privacy (such as individual medical records)

Table 4-2. CBI Substantiation Questions

No.	Question
1.	Please specifically explain what harm to the competitive position of your business would be likely to result from the release of the information claimed as confidential. How would that harm be substantial? Why is the substantial harm to your competitive position likely (i.e., probable) to be caused by release of the information rather than just possible? If you claimed multiple types of information to be confidential (e.g., site information, exposure information, environmental release information), explain how disclosure of each type of information would be likely to cause substantial harm to the competitive position of your business.
2.	Has your business taken precautions to protect the confidentiality of the disclosed information? If yes, please explain and identify the specific measures, including but not limited to internal controls, that your

No.	Question
	business has taken to protect the information claimed as confidential. If the same or similar information was previously reported to EPA as non-confidential (such as in an earlier version of this submission), please explain the circumstances of that prior submission and reasons for believing the information is nonetheless still confidential.
3.	(A) Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain. (B) Does any of the information claimed as confidential otherwise appear in any public documents, including (but not limited to) safety data sheets; advertising or promotional material; professional or trade publications; state, local, or Federal agency files; or any other media or publications available to the general public? If yes, please explain why the information should be treated as confidential. (C) Does any of the information claimed as confidential appear in one or more patents or patent applications? If yes, please provide the associated patent number or patent application number (or numbers) and explain why the information should be treated as confidential.
4.	Is the claim of confidentiality intended to last less than 10 (ten) years (see TSCA section 14(e)(1)(B))? If yes, please indicate the number of years (between 1 (one) and 10 (ten) years) or the specific date after which the claim is withdrawn.
5.	Has EPA, another federal agency, or court made any confidentiality determination regarding information associated with this chemical substance? If yes, please provide the circumstances associated with the prior determination, whether the information was found to be entitled to confidential treatment, the entity that made the decision, and the date of the determination.

4.2.1 Exemptions

The following data, if claimed CBI, are exempt from the substantiation requirement:

- For mining, milling, or importing of bulk asbestos, the quantity of asbestos, in pounds
- For mining, milling, or importing of bulk materials containing asbestos, the quantity of bulk material manufactured or processed
- For primary processing, the total quantity of asbestos processed
- For primary processing, the total annual production quantity of end products produced
- For secondary processing, the estimated total quantity of asbestos processed
- For secondary processing, the total annual production quantity of end products produced
- For importing, the estimated total quantity of asbestos imported
- For importing, the total annual import quantity of the imported product

4.3 Company and site information

4.3.1 Confidentiality of Company, Site, and Technical Contact Information

Check the appropriate CBI box in this block and complete the substantiation questions to assert a confidentiality claim. Checking the CBI box automatically triggers the substantiation questions. See Table 4-2 for substantiation questions related to these data elements. If you do not check the CBI box for any information element, then that information is not claimed as CBI and may be made public without further notice to you. Further, if you fail to substantiate your CBI claims in accordance with the statute and applicable rules, EPA may make the information

available to the public without further notice to you. For additional information about how to answer substantiation questions, visit www.epa.gov/tsca-cbi on the EPA website.

You may assert a claim of confidentiality for a site, company, or technical contact identity to protect the link between that information and the reported asbestos information. Such claims should only be asserted where the linkage of that information to reportable asbestos is confidential and not publicly available.

EPA also has observed that submitters sometimes claim only their company identity, but not their site identity, as confidential. EPA will not impute the assertion of a CBI claim for site identity as an assertion of a CBI claim for company identity, even if the company name appears within the site identity information. In other words, if your intent is to claim company name as confidential you must claim all data elements that reference or allude to company name as CBI. Failure to do so will likely result in a denial of a CBI claim for company name.

4.3.2 Special Provisions for Certain Sites

For asbestos that is domestically manufactured or processed, the site is the location where the asbestos is physically manufactured or processed.

For importers, the site where you import a chemical substance is considered the site of the operating unit within your organization that is directly responsible for importing the chemical substance and that controls the import transaction. For asbestos section 8(a)(1), all importers must provide a U.S. address for the controlling site; this site may be your company's headquarters in the United States. If there is no such operating unit or headquarters in the United States, the site address for the importer is the U.S. address of an agent acting on the importer's behalf who is authorized to accept service of process for the importer (40 CFR 711.3). In the event that more than one person may meet the definition of "importer" (40 CFR 704.3), only one person should report. See 40 CFR 711.22(b).

Example 4-1. The headquarters of your company is located in New Town. Your company owns a plant site located in Old Town, which is in a different state. A headquarters employee purchases and arranges to have 50,000 lb of asbestos imported from Russia to the Old Town plant site. The headquarters site in New Town controls the import transaction and is the site reported.

Example 4-2. The headquarters of your company is located in New Town. Your company owns three manufacturing sites, Sites 1, 2, and 3, all located in different states. An employee based at headquarters purchases and arranges to have 50,000 lb of asbestos imported from Russia. The chemical is distributed as follows: 2,000 lb is delivered to Site 1; 18,000 lb is delivered to Site 2; and 30,000 lb is delivered to Site 3. The headquarters in New Town controls the import transaction for all three sites, and therefore is responsible for reporting all 50,000 lb of asbestos. The site reported is New Town.

4.3.3 Parent Company Information¹

You must provide information about your parent company. For purposes of section 8(a)(1), a parent company is the highest-level company of your site's ownership hierarchy as of the start of the submission period according to the definitions of *parent company* and *highest-level parent company* at 40 CFR 711.3. Report your highest-level parent company located in the United States. Provide the company name, address, and D&B number following the instructions, including the naming conventions, provided below. Table 4-3 contains examples of how to identify the parent company in different situations.

Note that although some TSCA reporting requires you to report your U.S. parent company and your foreign parent company, section 8(a)(1) reporting requires only the U.S. parent to be reported.

Table 4-3. Applying Highest-level Parent Company Definition in Different Situations

Site Ownership	U.S. Parent Company
(1) If the site is entirely owned by a single U.S. company that is not owned by another company	Then that single company is the U.S. parent company.
(2) If the site is entirely owned by a single U.S. company that is, itself, owned by another U.S.-based company (e.g., it is a division or subsidiary of a higher-level company)	The highest-level domestic company in the ownership hierarchy is the U.S. parent company.
(3) If the site is owned by more than one company (e.g., company A owns 40 percent, company B owns 35 percent, and company C owns 25 percent of the site)	<p>The company with the largest ownership interest in the site is the parent company. Under this scenario, this would be either company A itself (if it doesn't have a U.S.-based parent company), company A's parent, or, if it exists, a single parent company that owns both company B and company C, in which case that single parent company would have the largest ownership interest (e.g., corporation X owns companies B and C, for a total ownership of 60 percent for the site).</p> <p>If the parent company is a U.S. company owned by another U.S. company, then the highest-level domestic company in the ownership hierarchy is the U.S. parent company.</p> <p>If the parent company is a foreign company, then the site is its own U.S. parent company.</p>
(4) If the site is ultimately owned by a 50:50 joint venture or a cooperative	The joint venture or cooperative is its own U.S. parent company.
	If the site is owned by a U.S. joint venture or cooperative, the highest level of the joint venture or cooperative is the U.S. parent company.
(5) If the site is entirely owned by a foreign company (i.e., without a U.S.-based subsidiary within the facility's ownership hierarchy)	The site is the U.S. parent company.
(6) If the site is a federally owned facility	The highest-level federal agency or department is the U.S. parent company.

¹ See Section 4.3.1 for information concerning CBI claims for Parent Company Information.

Site Ownership	U.S. Parent Company
(7) If the site is owned by a non-federal public entity	That entity (such as a municipality, State, or tribe) is the U.S. parent company.

4.3.3.1 U.S. Parent Company Name(s)

All sites must enter the full name of the U.S. parent company. EPA requires that parent companies be referenced consistently by the same name so that site-level information can be aggregated to the associated parent company. This can be challenging because filers within the same parent company often submit names with small variations (e.g., Exopack vs. Exopack Holdings Corp). When reporting your parent company name, eliminate all periods, commas, and all leading, trailing, and duplicate spaces. Replace commonly used acronyms and corporate terms according to Table 4-4:

Table 4-4. Parent Company Name Standardization

Use This	Not This
&	AND
CORP	CORPORATION
ASSOC	ASSOCIATION
CO	COMPANY
COS	COMPANIES
DIV	DIVISION
INC	INCORP
INC	INCORP.
INC	INCORPORATED
INC	INCORPERATED
LP	LIMITED PARTNERSHIP
LTD	LIMITED
LLC	LIMITED LIABILITY COMPANY
LLC	LIMITED LIABILITY CO.
PTNR	PARTNERSHIP
USA	U.S.
USA	U.S.A.
USA	U.S.A
USA	U S A
USA	UNITED STATES OF AMERICA
USA	UNITED STATES

Parent Company Address

Enter the mailing address of each parent company, including the appropriate county or parish, using standard addressing techniques as established by the U.S. or international postal

services. Post office box numbers should be accompanied by a street address. If a post office box is listed, it must be entered after the street address. Standardized conventions for listing a street address should be used to account for common formatting discrepancies, such as punctuation (by eliminating all periods, commas, and all leading, trailing, and duplicate spaces), capitalization, and abbreviations in order to increase the reliability and usability of the data. Replace commonly used acronyms and street abbreviations according to Table 4-5:

Table 4-5. Parent Company Street Address Standardization

Use This	Not This
AVE	AVENUE
AVE	AVE.
BLVD	BOULEVARD
BLVD	BLVD.
DR	DRIVE
DR	DR.
HWY	HIGHWAY
HWY	HWY.
JCT	JUNCTION
JCT	JCT.
LN	LANE
LN	LN.
PL	PLACE
PL	PL.
PO BOX	P.O. BOX
RD	ROAD
RD	RD.
RTE	ROUTE
ST	STREET
ST	ST.

Parent Company Dun & Bradstreet D-U-N-S® Number

Enter the 9-digit Dun & Bradstreet D-U-N-S® number (D&B number) associated with each parent company name. The number may be obtained from the treasurer or financial officer of the company.

D&B assigns separate numbers to subsidiaries and parent companies; you should make sure that the number you provide EPA belongs to your U.S. parent company. To verify the accuracy of your site and parent company D&B number and name, go to www.dnb.com/product/dlw/form_cc4.htm or call 1-800-234-3867. Callers to the toll-free phone number should understand that the D&B support representatives will need to verify that callers requesting the D&B number are an agent of the business. D&B recommends knowing basic

information such as when the business originated, officer names, and the name, address, and phone number for the facility.

You must obtain a D&B number for your parent company if none exists. If your parent company does not have a D&B number, you can request one from your local office of D&B. 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 D&B number, see www.dnb.com. If you are already listed with D&B, but do not know your number, you can call 1-800-234-3867 for assistance.

4.3.3.2 Authorized Official

This section requests information about the person who will serve as Authorized Official for the submitter company and who will be able to sign the certification statement as described in Section **Error! Reference source not found.** Provide the authorized official's full name, mailing address, telephone number, and e-mail address. Enter the authorized contact's full mailing address, using standard addressing techniques as established by the U.S. or international postal services, as applicable. Post Office box numbers should be accompanied by a street address. If a Post Office box is used as a mailing address, the street address should be given followed by the Post Office box number. Standardized conventions for listing a mailing address will be used to account for common formatting discrepancies, such as punctuation (by eliminating all periods, commas, and all leading, trailing, and duplicate spaces), capitalization, and abbreviations in order to increase the reliability and usability of the data. See Table 4-5 in Section 4.3.3.1. If the authorized contact is outside of the United States, include the country code for their telephone number.

4.3.3.3 Technical Contact Information

Provide the name of the person who will serve as technical contact for the submitter company and who EPA may contact for clarification of the information in your CDR submission. The technical contact should be a person who can answer questions about the reported information. Typically, a person located at the manufacturing site is best able to answer such questions. However, companies may use their discretion in selecting a technical contact or multiple technical contacts, as provided by the web tool. In selecting the technical contact, submitters should consider that EPA may have follow-up questions about a submission years after the submission date. The technical contact need not be the person who signed the certification statement.

Provide the technical contact's full name, mailing address, telephone number, and e-mail address as described in Section 4.3.3.2 for authorized officials. The section 8(a)(1) online reporting tool has an option to "Copy Information from CDX Registration" as appropriate.

4.3.3.4 Site Information

EPA requires the following information to be reported for each plant site at which asbestos is manufactured or processed: the site name, street address, city, county (or parish), state, and zip code, and six-digit North American Industry Classification System (NAICS) code(s) of the site.

The section 8(a)(1) reporting tool will automatically populate the site name and street address from the site used for Authorized Official's CDX registration. If you need to change this

information, you will need to make corrections or create a new site in CDX and create a new form for the corrected or new site.

Site D&B number

D&B assigns separate numbers to subsidiaries and parent companies; make sure that the number you provide EPA belongs to the individual site for which you are reporting. You must obtain a D&B number for the site, if none exists. If the site does not have a D&B number, you can request one from your local office of D&B. Please refer to Section 4.3.3.1 for information on obtaining a D&B number.

Other site identification numbers

Report any other site identification numbers, such as Facility Registry Service (FRS) ID number, Resource Conservation and Recovery Act (RCRA) IDs, Toxics Release Inventory ID, or other identification numbers.

Number of employees

Report the total number of employees at the site. Select the code from Table 4-6 that best describes the number of people employed at the site during calendar years 2019-2022 (e.g., the average number of employees).

Table 4-6. Codes for Number of Employees.

Code	Range
W1	Fewer than 10 employees
W2	At least 10 but fewer than 25 employees
W3	At least 25 but fewer than 50 employees
W4	At least 50 but fewer than 100 employees
W5	At least 100 but fewer than 500 employees
W6	At least 500 but fewer than 1,000 employees
W7	At least 1,000 but fewer than 10,000 employees
W8	At least 10,000 employees

Physical Address is Different than Mailing Address

Check this box if appropriate and enter physical address information.

Site NAICS code(s)

Add the appropriate six-digit North American Industry Classification System (NAICS) code(s) for each site reported. Up to three NAICS codes can be selected. The NAICS code is the standard Federal statistical agencies use in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. Information about NAICS codes can be obtained from the U.S. Census website at www.census.gov/eos/www/naics/.

In some circumstances it may be challenging to identify a single NAICS code for the site. In those circumstances, you may report up to three NAICS codes to more appropriately describe

your site. For example, headquarters sites that import for other sites may have difficulty identifying a single NAICS code.

Note that the site NAICS code(s) may not be claimed as confidential.

4.4 Asbestos Fibers

Report the most specific asbestos type(s) that applies by clicking “Add Asbestos Fiber”. Refer to Table 4-7 below. If the specific asbestos type is not known or reasonably ascertainable, report the general listing, “asbestos CASRN 1332-21-4”.

Table 4-7. Asbestos Types

CASRN	Asbestos Type
1332-21-4	Asbestos
12001-29-5	Chrysotile
12001-28-4	Crocidolite
12172-73-5	Amosite
77536-67-5	Anthophyllite
77536-68-6	Tremolite
77536-66-4	Actinolite
NA	Libby Amphibole (mainly consisting of tremolite [CASRN 77536-68-6], winchite [CASRN 12425-92-2], and richterite [CASRN 17068-76-7])

For form B, you will be prompted to report further information for each asbestos type selected. The reporting tool will automatically display the required fields for Form A or Form B based on whether you know the amount of asbestos in your product.

4.5 Reporting Activity Information

Select all the relevant activities conducted at the site for each asbestos type you selected. If more than one activity applies, select all activities that apply. The activities you may choose from are:

1. Mining of bulk asbestos or bulk materials containing asbestos, including as an impurity: An asbestos mine is an entity that mines asbestos-containing ore. Milling of bulk asbestos or bulk materials containing asbestos, including as an impurity. Mined (i.e., extracted) asbestos-containing ore is further milled to produce bulk asbestos. Milling involves the separation of the fibers from the ore, grading and sorting the fibers, or fiberizing crude asbestos ore. An asbestos mill is an entity that mills asbestos-containing ore.
2. Importer of bulk asbestos or bulk materials containing asbestos, including as an impurity: An importer of bulk asbestos imports bulk asbestos into the customs territory of the United States. EPA anticipates that companies who are mining, milling, or importing bulk asbestos will report using Form B, because the volume of asbestos is likely known to or reasonably ascertainable by them.
3. Primary processor of bulk asbestos or bulk materials containing asbestos, including as an impurity: A primary processor starts with bulk asbestos or bulk materials containing

asbestos and makes a mixture that contains asbestos as a component. A primary processor may simply mix or repackage different types or sizes of fibers and then sell that product. Mixtures that contain asbestos are products to which asbestos has been intentionally added and which can be used or processed further and incorporated into other products. For example, asbestos cement, asbestos paper, and asbestos-reinforced plastics are instances where asbestos is contained in a mixture. Primary processors are defined in the 40 CFR section 704.180(a), a definition adapted from the definition of primary processor in the 1982 *Asbestos Reporting Requirements Rule* (see Unit II.C.1.).

4. Secondary processor of mixtures or articles containing asbestos, including as an impurity: Secondary processors are those who start with asbestos when it is a component of a mixture and incorporate the mixture into their own products. For example, persons who fabricate an asbestos cement sheet by cutting the sheet to make an electrical switch board, or persons who make garments by cutting an asbestos-containing textile, are secondary processors. Secondary processors are defined in 40 CFR section 704.180(a), a definition adapted from the definition of primary processor in the 1982 *Asbestos Reporting Requirements Rule* (see Unit II.C.1.).
5. Importer of products, mixtures, or articles containing asbestos, including as an impurity. An importer of asbestos contained in a mixture or article that contain asbestos, including as an impurity, imports these substances into the customs territory of the United States.

4.5.1 Confidentiality of Activity Information

Check the appropriate CBI box in this block and complete the substantiation questions to assert a confidentiality claim for information being submitted in this section. Checking the CBI box automatically triggers the substantiation questions. See Table 4-2 for substantiation questions related to these data elements. If you do not check the CBI box for any information element, then that information is not claimed as CBI and may be made public without further notice to you. Further, if you fail to assert your CBI claims in accordance with the statute and applicable rules, EPA may make the information available to the public without further notice to you. For additional information about how to answer substantiation questions, visit www.epa.gov/tsca-cbi on the EPA website.

Table 4-8. Substantiation Questions for Activity Information

No.	Question
1.	Please specifically explain what harm to the competitive position of your business would be likely to result from the release of the information claimed as confidential. How would that harm be substantial? Why is the substantial harm to your competitive position likely (i.e., probable) to be caused by release of the information rather than just possible? If you claimed multiple types of information to be confidential (e.g., site information, exposure information, environmental release information), explain how disclosure of each type of information would be likely to cause substantial harm to the competitive position of your business.
2.	Has your business taken precautions to protect the confidentiality of the disclosed information? If yes, please explain and identify the specific measures, including but not limited to internal controls, that your business has taken to protect the information claimed as confidential. If the same or similar information was previously reported to EPA as non-confidential (such as in an earlier version of this submission), please explain the circumstances of that prior submission and reasons for believing the information is nonetheless still confidential.

No.	Question
3.	(A) Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain. (B) Does any of the information claimed as confidential otherwise appear in any public documents, including (but not limited to) safety data sheets; advertising or promotional material; professional or trade publications; state, local, or Federal agency files; or any other media or publications available to the general public? If yes, please explain why the information should be treated as confidential. (C) Does any of the information claimed as confidential appear in one or more patents or patent applications? If yes, please provide the associated patent number or patent application number (or numbers) and explain why the information should be treated as confidential.
4.	Is the claim of confidentiality intended to last less than 10 (ten) years (see TSCA section 14(e)(1)(B))? If yes, please indicate the number of years (between 1 (one) and 10 (ten) years) or the specific date after which the claim is withdrawn.
5.	Has EPA, another federal agency, or court made any confidentiality determination regarding information associated with this chemical substance? If yes, please provide the circumstances associated with the prior determination, whether the information was found to be entitled to confidential treatment, the entity that made the decision, and the date of the determination.

4.5.2 Mined, milled, or imported bulk asbestos or bulk materials containing asbestos, including as an impurity

If you selected mining, milling, or importing bulk asbestos or bulk materials containing asbestos, you will be prompted to report additional information about each asbestos type and bulk material type as described in Section **Error! Reference source not found.** and Section 4.5.2.1 below.

Quantity of asbestos (Form B only)

Report, in whole pounds and for each reporting year, the quantity of bulk asbestos of the selected type that was mined, milled, or imported at the site. Report the quantity to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. Quantities should be reported in numeric format, without commas (e.g., 6352000). **Report only the weight of asbestos mined, milled, or imported.** Do not include the weight of any other materials (e.g., containers or other chemical substances).

Disposition of asbestos (Form B only)

For each reporting year, use the disposition codes in Table 4-9 below to indicate the disposition of the bulk asbestos of the selected type that was mined, milled, or imported at the site. If you select code 6, “disposed of within the U.S.,” you must provide a description of the U.S. disposal. If you select code 7, “other,” you must provide a description of the “other” disposition.

Table 4-9. Disposition Codes

Code	Disposition Description
1	Used on-site, including further processed
2	Stored on-site
3	Sent to another U.S. site (including intra-company transfer) for use or processing

Code	Disposition Description
4	Stored at another U.S. site (including intra-company transfer)
5	Exported outside of the U.S. without further processing
6	Disposed of within the U.S. (explain)
7	Other (explain)

4.5.2.1 **Bulk material type**

Report the bulk material type(s) manufactured or processed (e.g., talc, vermiculite). For Form B, you will be prompted to report further information for each bulk material type selected. All reporters must report the disposition of the bulk material.

Quantity of bulk material manufactured or processed (Form B only)

For each reporting year, report the quantity and units for the amount of bulk material manufactured or processed. Report the quantity to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. Quantities should be reported in numeric format, without commas (e.g., 6352000). Report only the weight of the bulk material mined, milled, or imported. Do not include the weight of any other materials (e.g., containers).

Percent asbestos impurity by weight in bulk material (Form B only)

For each reporting year, report the percent of asbestos by weight present as an impurity in the bulk material. Report the percent to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. Percentages should be reported in numeric format including decimal points, without percentage signs (e.g., 8.5).

Testing or test results assessing asbestos content (Form B only)

Report any testing of or test results assessing the asbestos content of your bulk material in the applicable reporting years. If testing was conducted, specify how often testing was conducted on the presence of asbestos in your bulk material and what method and type of test was used for determining asbestos content, and provide the test results. If testing was not conducted, explain how you knew or reasonably ascertained the presence and amount of asbestos in the bulk materials.

Disposition of bulk material

For each reporting year, use the disposition codes in Table 4-9 above to indicate the disposition of the bulk asbestos of the selected type that was mined, milled, or imported at the site. If you select code 6, “disposed of within the U.S.,” you must provide a description of the U.S. disposal. If you select code 7, “other,” you must provide a description of the “other” disposition.

4.5.3 **Primary processors**

If you selected primary processing of bulk asbestos or bulk materials containing asbestos, including as an impurity, you will be prompted to report additional information about each asbestos-containing product type as described in Section 4.5.3.2. Primary processors start with bulk asbestos or bulk materials containing asbestos and make a mixture that contains asbestos as a component.

4.5.3.1 Quantity of asbestos processed (Form B only)

Report the total quantity of asbestos processed, in whole pounds and for each reporting year. Report the quantity to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. Quantities should be reported in numeric format, without commas (e.g., 6352000). **Report only the weight of asbestos processed.** Do not include the weight of any other materials (e.g., containers or other chemical substances).

4.5.3.2 End Product Types

Select all end product types produced at your facility containing asbestos. If an end product produced at your facility is not listed in the table, select “other” from the appropriate section (e.g., for a non-listed floor covering, select code 15, “Other” (specify generic name)). A textbox will appear for you to add a description of the product and the unit of measure you will use to report the quantity of end products produced. Select as many end product types as apply. For each end product type, you will be prompted to provide additional information.

Table 4-10. End Product Types

Code	Name	End Product Unit of Measure
Papers, Felts, or Related Products		
01	Commercial paper	Short Tons
02	Rollerboard	Short Tons
03	Millboard	Short Tons
04	Pipeline wrap	Short Tons
05	Beater-add gasketing paper	Short Tons
06	High-grade electrical paper	Short Tons
07	Unsaturated roofing felt	Short Tons
08	Saturated roofing felt	Short Tons
09	Flooring felt	Short Tons
10	Corrugated paper	Short Tons
11	Specialty paper (specify generic name)	Short Tons
12	Other (specify generic name)	(Specify)
Floor Coverings		
13	Vinyl asbestos floor tile	Square yards
14	Asbestos felt backed vinyl flooring	Square yards
15	Other (specify generic name)	(Specify)
Asbestos Cement Products		
16	A/C pipe and fittings	Short Tons
17	A/C sheet, flat	100 sq. ft.
18	A/C sheet corrugated	100 sq. ft.

Code	Name	End Product Unit of Measure
19	A/C shingle	Squares
20	Other (specify generic name)	(Specify)
Transportation Friction Materials (including aircrafts, marine vessels, railroad engine and railcars, and other vehicles)		
21	Drum brake lining (light-medium vehicle)	Pieces
22	Disc brake pads (light-medium vehicle)	Pieces
23	Disc brake pads (heavy vehicle)	Pieces
24	Brake block (heavy equipment)	Pieces
25	Clutch facings (all)	Pieces
26	Automatic transmission friction components	Pieces
27	Friction materials (industrial and commercial)	Pieces
28	Custom automotive body filler	Pieces
29	Transmissions	Pieces
30	Mufflers	Pieces
31	Radiator top insulation	Pieces
32	Radiator sealant	Pieces
33	Other (specify generic name)	(Specify)
Appliances		
34	Appliance Industrial and consumer (specify generic name)	Pieces
35	Other (specify generic name)	(Specify)
Construction Products		
36	Boiler and furnace baffles	Pieces
37	Decorated building panels	Pieces
38	Asbestos cement sheet	Pieces
39	Flexible Air Conductor	Pieces
40	Hoods and Vents	Pieces
41	Portable construction building	Pieces
42	Roofing, saturated	Pieces
43	Roof shingles	Pieces
44	Wallboard	Pieces
45	Wall/roofing panels	Pieces
46	Other (specify generic name)	(Specify)
Electrical Products and Components		
47	Cable insulation	Pieces

Code	Name	End Product Unit of Measure
48	Electronic motor components	Pieces
49	Electrical resistance supports	Pieces
50	Electrical switchboard	Pieces
51	Electrical switch supports	Pieces
52	Electrical wire insulation	Pieces
53	Motor armature	Pieces
54	Other (specify generic name)	(Specify)
Fire and Heat Shielding Equipment and Components		
55	Arc deflectors	Pieces
56	Fire doors	Pieces
57	Fireproof absorbent paper	Short tons
58	Heat shields	Pieces
59	Molten metal handling equipment	Pieces
60	Oven and stove insulation	Short tons
61	Pipe wrap	Pieces
62	Stove lining, wood and coal	Pieces
63	Stove pipe rings	Pieces
64	Sleeves	Pieces
65	Thermal Insulation	Short tons
66	Other (specify generic name)	(Specify)
Textiles and Clothing		
67	Cloth	Pounds
68	Thread, yarn, lap, roving, cord, rope, or wick	Pounds
69	Aprons	Pieces
70	Boots	Pieces
71	Gloves and mittens	Pieces
72	Hats and helmets	Pieces
73	Overgaiters	Pieces
74	Suits	Pieces
75	Aluminized cloth	Short Tons
76	Rope or braiding	Short Tons
77	Yarn, lap or roving	Short Tons
78	Wicks	Short Tons
79	Bags	Pieces

Code	Name	End Product Unit of Measure
80	Belting	Short Tons
81	Blankets	Pieces
82	Carpet padding	Short Tons
83	Commercial/industrial dryer felts	Short Tons
84	Draperies	Pieces
85	Drip cloths	Pieces
86	Fire hoses	Pieces
87	Ironing board pads and insulation	Pieces
88	Mantles, lamp or catalytic heater	Pieces
89	Packing and packaging components	Pieces
90	Piano and organ felts	Pieces
91	Rugs	Pieces
92	Tape	Pieces
93	Theater curtains	Pieces
94	Umbrellas	Pieces
95	Other (specify generic name)	(Specify)
Gaskets		
96	Sheet gasketing, rubber encapsulated beater addition	Pieces
97	Sheet gasketing, rubber encapsulated compressed	Pieces
98	Compressed sheet gasketing (other)	Pieces
99	Metal reinforced gaskets	Pieces
100	Automotive gaskets	Pieces
101	Other (specify generic name)	(Specify)
Marine Equipment and Supplies		
102	Caulks, marine	Pounds
103	Liners, pond or canal	Pieces
104	Marine bulkheads	Pieces
105	Other (specify generic name)	(Specify)
Paints, Coatings, Sealants and Compounds		
106	Asphaltic compounds	Pounds
107	Automotive/truck body coatings	Gallons
108	Buffing and polishing compounds	Pounds
109	Caulking and patching compounds	Pounds
110	Drilling fluid	Gallons

Code	Name	End Product Unit of Measure
111	Flashing compounds	Pounds
112	Furnace cement	Pounds
113	Glazing compounds	Pounds
114	Plaster and stucco	Pounds
115	Pump valve, flange and tank sealing components	Pieces
116	Roof coatings	Gallons
117	Textured paints	Gallons
118	Tile cement	Pounds
119	Other (specify generic name)	(Specify)
Other Products		
120	Sheet gasketing (other than beater-add)	Square Yards
122	Packing	Pounds
123	Paints and surface coatings	Gallons
124	Adhesives and sealants	Gallons
125	Asbestos-reinforced plastics	Pounds
126	Insulation materials not elsewhere classified (specify generic name)	(Specify)
127	Mixed or repackaged asbestos	Short Tons
128	Aerial distress flares	Pieces
129	Acoustical product	Pieces
130	Ammunition wadding	Pieces
131	Ash trays	Pieces
132	Baking sheets	Pieces
133	Blackboards	Pieces
134	Candlesticks	Pieces
135	Chemical tanks and vessels	Pieces
136	Filters	Pieces
137	Grommets	Pieces
138	Gun grips	Pieces
139	Jewelry making equipment	Pieces
140	Kilns	Pieces
141	Lamp sockets	Pieces
142	Light bulbs (all types)	Pieces
143	Linings for vaults, safes, humidifiers and filing cabinets	Pieces
144	Phonograph records	Pieces

Code	Name	End Product Unit of Measure
145	Pottery clay	Pounds
146	Welding rod coatings	Pieces
147	Other (specify generic name)	(Specify)

Annual production quantity

Report the total annual production quantity of end products produced, using the unit of measure provided for that product in Table 4-10 above.

Percent asbestos weight in end product (Form B only)

Report the percent of asbestos by weight present in the end product. Report the percent to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. Percentages should be reported in numeric format including decimal points, without percentage signs (e.g., 8.5).

Disposition of end product (Form B only)

For each reporting year, use the disposition codes in Table 4-9 above to indicate the disposition of the end product. If you select code 6, “disposed of within the U.S.,” you must provide a description of the U.S. disposal. If you select code 7, “other,” you must provide a description of the “other” disposition.

Testing or test results assessing asbestos content (Form B only)

Report any testing of or test results assessing the asbestos content of your end product in the applicable reporting years. If testing was conducted, specify how often testing was conducted on the presence of asbestos in your end product and what method and type of test was used for determining asbestos content, and provide the test results. If testing was not conducted, explain how you knew or reasonably ascertained the presence and amount of asbestos in the end product.

4.5.4 Secondary processors

If you selected secondary processing of asbestos (processing asbestos when a component of a mixture and articles containing asbestos, including as an impurity), you will be prompted to report additional information about each asbestos-containing product type as described in Section 4.5.4.2. Secondary processors are those who start with asbestos when it is a component of a mixture and incorporate the mixture into their own products. For example, persons who fabricate asbestos cement sheet by cutting the sheet to make an electrical switch board, or persons who make garments by cutting an asbestos-containing textile, are secondary processors.

4.5.4.1 Quantity of asbestos processed (Form B only)

Report the total quantity of asbestos processed, in whole pounds. Report the quantity to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. **Report only the weight of asbestos processed.** Do not include the weight of any other materials (e.g., containers or other chemical substances).

4.5.4.2 End Product Types

Select all end product types produced at your facility containing asbestos from Table 4-10 above. If an end product produced at your facility is not listed in the table, select “other” from the appropriate section (e.g., for a non-listed floor covering, select code 15). A textbox will appear for you to add a description of the product and the unit of measure you will use to report the quantity of end products produced. Select as many end product types as apply. For each end product type, you will be prompted to provide additional information.

Annual production quantity

Report the total annual production quantity of end products produced, using the unit of measure provided for that product in Table 4-10 above.

Percent asbestos weight in end product (Form B only)

Report the percent of asbestos by weight present in the end product. Report the percent to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. Percentages should be reported in numeric format including decimal points, without percentage signs (e.g., “8.5” for 8.5%, not “0.085”).

Testing or test results assessing asbestos content (Form B only).

Report any testing of or test results assessing the asbestos content of your end product in the applicable reporting years. If testing was conducted, specify how often testing was conducted on the presence of asbestos in your end product and what method and type of test was used for determining asbestos content, and provide the test results. If testing was not conducted, explain how you knew or reasonably ascertained the presence and amount of asbestos in the end product.

Disposition of end product (Form B only)

For each reporting year, use the disposition codes in Table 4-9 above to indicate the disposition of the end product. If you select code 6, “disposed of within the U.S.,” you must provide a description of the U.S. disposal. If you select code 7, “other,” you must provide a description of the “other” disposition.

4.5.5 Importing of mixtures, or articles containing asbestos, including as an impurity

If you selected import of mixtures or articles containing asbestos, including as an impurity, you will be prompted to report additional information about each asbestos-containing product type as described in Section 4.5.5.2.

4.5.5.1 Quantity of asbestos imported (Form B only)

Report the total quantity of asbestos imported, in whole pounds. Note that if you import various mixtures containing asbestos, you should add all import volumes associated with each mixture. For instance, if you import three mixtures and each mixture contains asbestos, then you would determine the volume of asbestos in each mixture and report the aggregated amount.

Report the quantity to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. **Report only the weight of asbestos imported.** Do not include the weight of any other materials (e.g., containers or other chemical substances).

4.5.5.2 Imported Product Types

Select all imported product types containing asbestos imported by your facility from Table 4-10 above. If an imported product produced at your facility is not listed in the table, select “other” from the appropriate section (e.g., for a non-listed floor covering, select code 15). A textbox will appear for you to add a description of the product and the unit of measure you will use to report the quantity of end products produced. Select as many product types as apply. For each product type, you will be prompted to provide additional information.

Annual import quantity

Report the total annual imported quantity of the product, using the unit of measure provided for that product in Table 4-10 above.

Percent asbestos weight in end product (Form B only)

Report the percent of asbestos by weight present in the imported product. Report the percent to at least two significant figures; it should be accurate to the extent known to or reasonably ascertainable by you. Percentages should be reported in numeric format including decimal points, without percentage signs (e.g., 8.5).

Testing or test results assessing asbestos content (Form B only)

Report any testing of or test results assessing the asbestos content of your imported product in the applicable reporting years. If testing was conducted, specify how often testing was conducted on the presence of asbestos in your imported product and what method and type of test was used for determining asbestos content, and provide the test results. If testing was not conducted, explain how you knew or reasonably ascertained the presence and amount of asbestos in the imported product.

Disposition of end product (Form B only)

For each reporting year, use the disposition codes in Table 4-9 above to indicate the disposition of the imported product. If you select code 6, “disposed of within the U.S.,” you must provide a description of the U.S. disposal. If you select code 7, “other,” you must provide a description of the “other” disposition.

4.5.5.3 For Imported Asbestos, Is the Asbestos Never Physically at Site?

Report whether or not your imported asbestos is physically at the reporting site. Report one of the following choices:

- Yes, the imported asbestos **is never** physically at the reporting site (e.g., if you ship the chemical substance from a foreign country directly to another location such as a warehouse, a processing or use site, or a customer’s site).
- No, the imported asbestos **is** physically present at the reporting site.
- NA, not applicable because the asbestos is not imported.
- NKRA, it is not known to or reasonably ascertainable by you whether the imported asbestos is physically present at the reporting site.

4.5.6 Employee information

For each activity reported, you must report certain information about the employees involved with the activity.

4.5.6.1 Number of employees involved with the activity

Select the range code that best describes the number of employees physically involved in the activity from Table 4-6 above.

When a site employs temporary, seasonal, or contract workers in the manufacture or processing of reportable asbestos, these workers should be included in the number of workers involved in the activity if they work in areas where the asbestos is handled. Workers involved in the activity do not include those employees whose jobs are not associated with potential exposures to a chemical substance or mixture (e.g., administrative staff who never enter areas where the chemical substance is manufactured) and who are unlikely to be exposed to a chemical substance for even a brief period of time.

4.5.6.2 Personal protective equipment

Check the correct box indicating whether employees performing this activity use personal protective equipment (PPE). If PPE is used, use the textbox to describe the type of PPE used and which workers use each type of PPE, as specifically as possible.

4.5.6.3 Workplace exposure measurement assessments and data (Form B only)

Report any workplace exposure measurement assessments and data such as monitoring. The reporting software will guide you through the process of uploading attachments if needed.

4.6 Certification

Your submission(s) must be certified, indicating that your submitted information has been completed in compliance with the asbestos reporting requirements, such as all information known or reasonably ascertainable is submitted, and that the confidentiality claims made in this report are true and correct. To certify, the certification statement must be electronically signed and dated by an authorized official at your company. The authorized official typically is a senior official with management responsibility for the person (or persons) completing the form(s). You must include the printed name, title, and email address for the person signing the certification. See the CDX user guide including CDX Registration for information on how to complete an electronic signature agreement.

This certification statement applies to all the information supplied on the form(s). The certification statements appear when the submission process has been initiated, at which time the submitter must either certify or cancel the submission process. Note that knowingly providing false or misleading information or concealing required information may be punishable by fine or imprisonment or both under TSCA section 16(b).

5. How to Obtain Copies of Documents Cited in This Instructions Document

5.1 Obtaining Copies of the TSCA Rules

The section 8(a)(1) rule, [40 CFR Part 704](#), is available on the U.S. Government Publishing Office website, www.ecfr.gov.

You may also contact the TSCA Hotline by telephone at (202) 554-1404 or by email tsc-hotline@epa.gov for assistance.

5.2 Obtaining Copies of Other Information Materials

EPA has developed documents to provide additional information on submitting information for this reporting requirement. Except where otherwise noted, materials are available on the section 8(a)(1) website at <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/tsca-section-8a1-reporting-and-recordkeeping>.

- Instructions on CDX registration: [CDX Online Registration User Guide](#)
- Section 8(a)(1) reporting tool getting started user guide
- Chemical Data Reporting (CDR) fact sheet on [Reporting After Changes to Company Ownership or Legal Identity](#)

Appendix A. Glossary of Terms

The definitions and descriptions of terms used in section 8(a)(1) reporting provided below are taken from 40 CFR Part 704 unless otherwise noted.

Act means the Toxic Substances Control Act, as amended, 15 U.S.C. 2601 *et seq.*

Administrator means the Administrator of the Environmental Protection Agency. (See TSCA 3(1))

Article means a manufactured item (1) which is formed to a specific shape or design during manufacture, (2) which has end-use function(s) dependent in whole or in part upon its shape or design during end use, and (3) which has either no change of chemical composition during its end use or only those changes of composition which have no commercial purpose separate from that of the article, and that result from a chemical reaction that occurs upon end use of other chemical substances, mixtures, or articles; except that fluids and particles are not considered articles regardless of shape or design. (40 CFR 704.3)

Asbestos is a collective term meaning any of the substances listed in Table 1 of this paragraph. (40 CFR 704.180)

Table 1 in § 704.180(a) – CASRN of Asbestos Types

CASRN	Asbestos Type
1332-21-4	Asbestos
132207-32-0	Chrysotile
12001-28-4	Crocidolite
2172-73-5	Amosite
77536-67-5	Anthophyllite
77536-68-6	Tremolite
77536-66-4	Actinolite
NA	Libby Amphibole (mainly consisting of tremolite [CASRN 77536-68-6], winchite [CASRN 12425-92-2], and richterite [CASRN 17068-76-7])

Bulk asbestos means any quantity of asbestos fiber of any type or grade, or combination of types or grades, that is mined or milled with the purpose of obtaining asbestos. This term does not include asbestos that is produced or processed as a contaminant or an impurity. (40 CFR 704.180)

Bulk materials containing asbestos means bulk materials in which asbestos is being mined or milled as an impurity, such as in vermiculite or talc. (40 CFR 704.180)

Byproduct means a chemical substance produced without separate commercial intent during the manufacture, processing, use, or disposal of another chemical substance(s) or mixture(s). (40 CFR 704.3)

Central Data Exchange (CDX) means EPA's centralized electronic document receiving system, or its successors, including associated instructions for registering to submit electronic documents.

Chemical Information Submission System or **CISS** means EPA's electronic, web-based reporting tool for the completion and submission of CDR data, reports, and other information, or its successors. (40 CFR 704.180)

Chemical substance means any organic or inorganic substance of a particular molecular identity, including any combination of such substances occurring in whole or in part as a result of a chemical reaction or occurring in nature, and any element or uncombined radical. "Chemical substance" does *not* include:

- (1) Any mixture;
- (2) Any pesticide (as defined in the Federal Insecticide, Fungicide, and Rodenticide Act) when manufactured, processed, or distributed in commerce for use as a pesticide;
- (3) Tobacco or any tobacco product;
- (4) Any source material, special nuclear material, or byproduct material (as such terms are defined in the Atomic Energy Act of 1954 [42 U.S.C. 2011 et seq.] and the regulations issued under such Act);
- (5) Any article the sale of which is the subject to the tax imposed by section 4181 of the Internal Revenue Code of 1986 [26 U.S.C. 4181] (determined without regard to any exemptions from such tax provided by section 4182 or 4221 or any other provision of such Code) and any component of such an article (limited to shot shells, cartridges, and components of shot shells and cartridges); and
- (6) Any food, food additive, drug, cosmetic, or device (as such terms are defined in section 201 of the Federal Food, Drug, and Cosmetic Act [21 U.S.C. 321]) when manufactured, processed, or distributed in commerce for use as a food, food additive, drug, cosmetic, or device. (See TSCA 3(2))

Commerce means trade, traffic, transportation, or other commerce: (A) between a place in a State and any place outside of such State, or (B) which affects trade, traffic, transportation, or commerce described in clause (A). (TSCA 3(3))

Commercial use means the use of a chemical substance or a mixture containing a chemical substance (including as part of an article) in a commercial enterprise providing saleable goods or services. (40 CFR 711.3)

Component means a chemical substance which is intentionally present with another chemical substance. (40 CFR 704.180)

Consumer use means the use of a chemical substance or a mixture containing a chemical substance (including as part of an article) when sold to or made available to consumers for their use. (40 CFR 711.3)

Customs territory of the United States, as referenced in TSCA section 3 and defined in general note 2 of the Harmonized Tariff Schedule of the United States, includes only the States, the District of Columbia, and Puerto Rico.

Distribute in commerce and distribution in commerce, when used to describe an action taken with respect to a chemical substance or mixture or article containing a substance or mixture mean to sell, or the sale of, the substance, mixture, or article in commerce; to introduce or deliver for introduction into commerce, or the introduction or delivery for introduction into commerce of, the substance, mixture, or article; or to hold, or the holding of, the substance, mixture, or article after its introduction into commerce. (TSCA 3(5))

EPA means the United States Environmental Protection Agency. (40 CFR 704.3)

Form A means an abbreviated form for persons that know or can reasonably ascertain that they manufactured (including imported) or processed asbestos, including as an impurity, during the reporting period described in paragraph (f) but do not know and cannot reasonably ascertain the amount of asbestos manufactured (including imported) or processed by them. (40 CFR 704.180)

Form B means the standard form to be used by persons that know or can reasonably ascertain that they manufactured (including imported) or processed asbestos, including as an impurity, during the reporting period described in paragraph (f) and know or can reasonably ascertain how much asbestos they manufactured (including imported) or produced. (40 CFR 704.180)

Highest-level Parent Company means the highest-level company of the site's ownership hierarchy as of the start of the submission period during which data are being reported according to the following instructions. The highest-level U.S. parent company is located within the United States while the highest-level foreign parent company is located outside the United States. The following rules govern how to identify the highest-level U.S. parent company and highest-level foreign parent company (if applicable):

- (1) If the site is entirely owned by a single U.S. company that is not owned by another company, that single company is the U.S. parent company.
- (2) If the site is entirely owned by a single U.S. company that is, itself, owned by another U.S.-based company (e.g., it is a division or subsidiary of a higher-level company), the highest-level domestic company in the ownership hierarchy is the United States parent company. If there is a higher-level parent company that is outside of the United States, the highest-level foreign company in the ownership hierarchy is the foreign parent company.
- (3) If the site is owned by more than one company (e.g., company A owns 40 percent, company B owns 35 percent, and company C owns 25 percent), the company with the largest ownership interest in the site is the parent company. If a higher-level company in the ownership hierarchy owns more than one ownership company, then determine the entity with the largest ownership by considering the lower-level ownerships in combination (e.g., corporation x owns companies B and C, for a total ownership of 60 percent for the site).
 - (i) If the parent company is a U.S. company owned by another U.S. company, then the highest-level domestic company in the ownership hierarchy is the U.S. parent company. If the U.S. parent company has a higher-level foreign company in the ownership hierarchy, then the highest-level foreign company in the ownership hierarchy is the foreign parent company.
 - (ii) If the parent company is a foreign company, then the site is its own U.S. parent company and the foreign parent company is the highest-level foreign company in the ownership hierarchy.
- (4) If the site is owned by a 50:50 joint venture or a cooperative, the joint venture or cooperative is its own parent company. If the site is owned by a U.S. joint venture or cooperative, the highest level of the joint venture or cooperative is the U.S. parent company. If the site is owned by a joint venture or cooperative outside the United States, the highest level of the joint venture or cooperative outside the United States is the foreign parent company.
- (5) If the site is entirely owned by a foreign company (i.e., without a U.S.-based subsidiary within the site's ownership hierarchy), the highest-level foreign parent company is the facility's foreign parent company.

(6) If the site is federally owned, the highest-level federal agency or department is the U.S. parent company.

(7) If the site is owned by a non-federal public entity, that entity (such as a municipality, State, or tribe) is the U.S. parent company. (40 CFR 711.3)

Importer means

(1) any person who imports any chemical substance or any chemical substance as part of a mixture or article into the customs territory of the United States, and includes:

- (i) the person primarily liable for the payment of any duties on the merchandise, or
- (ii) an authorized agent acting on his/her behalf.

(2) Importer also includes, as appropriate:

- (i) The consignee.
- (ii) The importer of record.
- (iii) The actual owner if an actual owner's declaration and superseding bond have been filed in accordance with 19 CFR 141.20.
- (iv) The transferee, if the right to draw merchandise in a bonded warehouse has been transferred in accordance with subpart C of 19 CFR 144.

(3) For the purposes of this definition, the customs territory of the United States consists of the 50 States, Puerto Rico, and the District of Columbia. (40 CFR 704.3)

Impurity means a chemical substance which is unintentionally present with another chemical substance. (40 CFR 704.3)

Intermediate means any chemical substance that is consumed, in whole or in part, in chemical reactions used for the intentional manufacture of other chemical substances or mixtures, or that is intentionally present for the purpose of altering the rates of such chemical reactions. (40 CFR 704.3)

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. (40 CFR 704.3)

Manufacture means to manufacture, produce, or import, for commercial purposes. (40 CFR 704.3)

Manufacturer means a person who manufactures a chemical substance.

Manufacture for commercial purposes means: (1) to import, produce, or manufacture with the purpose of obtaining an immediate or eventual commercial advantage for the manufacturer, and includes among other things, such "manufacture" of any amount of a chemical substance or mixture:

- (i) For commercial distribution, including for test marketing.
- (ii) For use by the manufacturer, including use for product research and development, or as an intermediate.

(2) Manufacture for commercial purposes also applies to substances that are produced coincidentally during the manufacture, processing, use, or disposal of another substance or mixture, including both byproducts that are separated from that other substance or mixture and impurities that remain in that substance or mixture. Such byproducts and impurities may, or may

not, in themselves have commercial value. They are nonetheless produced for the purpose of obtaining a commercial advantage since they are part of the manufacture of a chemical product for a commercial purpose. (40 CFR 704.3)

Master Inventory File means EPA's comprehensive list of chemical substances which constitute the Chemical Substances Inventory compiled under section 8(b) of the Act. It includes substances reported under 40 CFR Part 710 and substances reported under Part 720 for which a Notice of Commencement of Manufacture or Import has been received under § 720.120.

Mixture means any combination of two or more chemical substances if the combination does not occur in nature and is not, in whole or in part, the result of a chemical reaction; except that such term does include any combination which occurs, in whole or in part, as a result of a chemical reaction if none of the chemical substances comprising the combination is a new chemical substance and if the combination could have been manufactured for commercial purposes without a chemical reaction at the time the chemical substances comprising the combination were combined. (15. U.S.C. 2602(10))

Naturally occurring substance is any chemical substance which is naturally occurring and: (1) which is (i) unprocessed or (ii) processed only by manual, mechanical, or gravitational means, by dissolution in water, by flotation, or by heating solely to remove water; or (2) which is extracted from air by any means. (40 CFR 710.4(b))

Non-isolated intermediate means any intermediate that is not intentionally removed from the equipment in which it is manufactured, including the reaction vessel in which it is manufactured, equipment which is ancillary to the reaction vessel, and any equipment through which the substance passes during a continuous flow process, but not including tanks or other vessels in which the substance is stored after its manufacture. (40 CFR 704.3)

Parent Company is a company that owns or controls another company. (40 CFR 704.3)

Person means any individual, firm, company, corporation, joint venture, partnership, sole proprietorship, association, or any other business entity; any State or political subdivision thereof, or any municipality; any interstate body; and any department, agency, or instrumentality of the Federal government. (40 CFR 704.3)

Primary processor means a person that starts with bulk asbestos or bulk materials containing asbestos and makes a mixture that contains asbestos as a component. (40 CFR 704.180)

Process means to process for commercial purposes. (40 CFR 704.3)

Process for commercial purposes means the preparation of a chemical substance or mixture after its manufacture for distribution in commerce with the purpose of obtaining an immediate or eventual commercial advantage for the processor. Processing of any amount of a chemical substance or mixture is included in this definition. If a chemical substance or mixture containing impurities is processed for commercial purposes, then the impurities also are processed for commercial purposes. (40 CFR 704.3)

Processor means any person who processes a chemical substance or mixture. (40 CFR 704.3)

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.

Repackaging means the physical transfer of a chemical substance or mixture, as is, from one container to another container or containers in preparation for distribution of the chemical substance or mixture in commerce.

Reportable chemical substance means a chemical substance described in § 711.5.

Secondary processor means a person that further processes asbestos, after primary processing of asbestos is completed, as a component of a mixture, or an article containing asbestos. (40 CFR 704.180)

Site means a contiguous property unit. Property divided only by a public right-of-way shall be considered one site. More than one plant may be located on a single site.

(a) For chemical substances manufactured under contract, i.e., by a co-manufacturer, the site is the location where the chemical substance is physically manufactured.

(b) The site for an importer who imports a chemical substance described in § 711.5 is the U.S. site of the operating unit within the person's organization that is directly responsible for importing the substance. The import site, in some instances, may be the organization's headquarters in the United States. If there is no such operating unit or headquarters in the United States, the site address for the importer is the United States address of an agent acting on behalf of the importer who is authorized to accept service of process for the importer.

(c) For portable manufacturing units sent out to different locations from a single distribution center, the distribution center shall be considered the site.

Site-limited means a chemical substance is manufactured and processed only within a site and is not distributed for commercial purposes as a substance or as part of a mixture or article outside the site. Imported substances are never site-limited. Although a site-limited chemical substance is not distributed for commercial purposes outside the site at which it is manufactured and processed, the substance is considered to have been manufactured and processed for commercial purposes.

Small government means the government of a city, county, town, township, village, school district, or special district with a population of less than 50,000. (40 CFR 704.3)

Small manufacturer means a manufacturer (including importer) that meets either of the following standards:

(1) *First standard.* A manufacturer (including importer) of a substance is small if its total annual sales, when combined with those of its parent company (if any), are less than \$120 million. However, if the annual production or importation volume of a particular substance at any individual site owned or controlled by the manufacturer or importer is greater than 45,400 kilograms (100,000 lbs), the manufacturer (including importer) will not qualify as small for purposes of reporting on the production or importation of that substance at that site, unless the manufacturer (including importer) qualifies as small under standard (2) of this definition.

(2) *Second standard.* A manufacturer (including importer) of a substance is small if its total annual sales, when combined with those of its parent company (if any), are less than \$12 million, regardless of the quantity of substances produced or imported by that manufacturer (including importer). (40 CFR 704.3)

Small processor means any processor whose total annual sales, when combined with those of its parent company (if any), are less than \$12 million. (40 CFR 704.180)

Small quantities solely for research and development (or “small quantities solely for purposes of scientific experimentation or analysis or chemical research on, or analysis of, such substance or another substance, including such research or analysis for the development of a product”) means quantities of a chemical substance manufactured, imported, or processed or proposed to be manufactured, imported, or processed solely for research and development that are no greater than reasonably necessary for such purposes. (40 CFR 704.3)

State means any State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, the Canal Zone, American Samoa, the Northern Mariana Islands, or any other territory or possession of the United States. (TSCA 3(16))

Submission period means the period in which data are submitted to EPA.

Test marketing means the distribution in commerce of no more than a predetermined amount of chemical substance, mixture, or article containing that chemical substance or mixture, or a mixture containing that substance, by a manufacturer or processor, to no more than a defined number of potential customers to explore market capability in a competitive situation during a predetermined testing period prior to the broader distribution of that chemical substance, mixture, or article in commerce. (40 CFR 704.3)

United States, when used in the geographic sense, means all of the States. (TSCA 3(17))

Use means any utilization of a chemical substance or mixture that is not otherwise covered by the terms *manufacture* or *process*. Relabeling or redistributing a container holding a chemical substance or mixture where no repackaging of the chemical substance or mixture occurs does not constitute use or processing of the chemical substance or mixture.

Appendix B. Descriptions of Codes for Reporting Number of Employees, Asbestos Type, Disposition, Product Type

The following descriptions were developed by EPA to assist persons submitting information in response to 40 CFR 704.180 and used for section 8(a)(1) reporting.

Table B-1 provides the codes for each range of employment numbers. These codes are used to report in Parts I and III.

Table B-1. Codes for Number of Employees.

Code	Range
W1	Fewer than 10 employees
W2	At least 10 but fewer than 25 employees
W3	At least 25 but fewer than 50 employees
W4	At least 50 but fewer than 100 employees
W5	At least 100 but fewer than 500 employees
W6	At least 500 but fewer than 1,000 employees
W7	At least 1,000 but fewer than 10,000 employees
W8	At least 10,000 employees

Table B-2 shows the CAS Registry Number for each type of asbestos. These are used for reporting requirements in Part II.

Table B-2. Asbestos Types

CASRN	Asbestos Type
1332-21-4	Asbestos
132207-32-0	Chrysotile
12001-28-4	Crocidolite
2172-73-5	Amosite
77536-67-5	Anthophyllite
77536-68-6	Tremolite
77536-66-4	Actinolite
NA	Libby Amphibole (mainly consisting of tremolite [CASRN 77536-68-6], winchite [CASRN 12425-92-2], and richterite [CASRN 17068-76-7])

Appendix B Descriptions of Codes for Reporting Number of Employees, Asbestos Type, Disposition, Product Type

Table B-3 provides the codes for each description of asbestos disposition. These codes are used to report in Part II.

Table B-3. Disposition Codes

Code	Disposition Description
1	Used on-site, including further processed.
2	Stored on-site
3	Sent to another U.S. site (including intra-company transfer) for use or processing.
4	Stored at another U.S. site (including intra-company transfer)
5	Exported outside of the U.S. without further processing
6	Disposed of within the U.S. (explain)
7	Other (explain)

Table B-4 contains the codes for a range of end products which may contain asbestos. Reporters must provide these codes in Part II.

Table B-4. End Product Types

Code	Name	End Product Unit of Measure
Papers, Felts, or Related Products		
01	Commercial paper	Short Tons
02	Rollerboard	Short Tons
03	Millboard	Short Tons
04	Pipeline wrap	Short Tons
05	Beater-add gasketing paper	Short Tons
06	High-grade electrical paper	Short Tons
07	Unsaturated roofing felt	Short Tons
08	Saturated roofing felt	Short Tons
09	Flooring felt	Short Tons
10	Corrugated paper	Short Tons
11	Specialty paper (specify generic name)	Short Tons
12	Other (specify generic name)	(Specify)
Floor Coverings		
13	Vinyl asbestos floor tile	Square yards
14	Asbestos felt backed vinyl flooring	Square yards
15	Other (specify generic name)	(Specify)
Asbestos Cement Products		

Appendix B Descriptions of Codes for Reporting Number of Employees, Asbestos Type, Disposition, Product Type

Code	Name	End Product Unit of Measure
16	A/C pipe and fittings	Short Tons
17	A/C sheet, flat	100 sq. ft.
18	A/C sheet corrugated	100 sq. ft.
19	A/C shingle	Squares
20	Other (specify generic name)	(Specify)
Transportation Friction Materials (including aircrafts, marine vessels, railroad engine and railcars, and other vehicles)		
21	Drum brake lining (light-medium vehicle)	Pieces
22	Disc brake pads (light-medium vehicle)	Pieces
23	Disc brake pads (heavy vehicle)	Pieces
24	Brake block (heavy equipment)	Pieces
25	Clutch facings (all)	Pieces
26	Automatic transmission friction components	Pieces
27	Friction materials (industrial and commercial)	Pieces
28	Custom automotive body filler	Pieces
29	Transmissions	Pieces
30	Mufflers	Pieces
31	Radiator top insulation	Pieces
32	Radiator sealant	Pieces
33	Other (specify generic name)	(Specify)
Appliances		
34	Appliance Industrial and consumer (specify generic name)	Pieces
35	Other (specify generic name)	(Specify)
Construction Products		
36	Boiler and furnace baffles	Pieces
37	Decorated building panels	Pieces
38	Asbestos cement sheet	Pieces
39	Flexible Air Conductor	Pieces
40	Hoods and Vents	Pieces
41	Portable construction building	Pieces
42	Roofing, saturated	Pieces
43	Roof shingles	Pieces
44	Wallboard	Pieces
45	Wall/roofing panels	Pieces

Appendix B Descriptions of Codes for Reporting Number of Employees, Asbestos Type, Disposition, Product Type

Code	Name	End Product Unit of Measure
46	Other (specify generic name)	(Specify)
Electrical Products and Components		
47	Cable insulation	Pieces
48	Electronic motor components	Pieces
49	Electrical resistance supports	Pieces
50	Electrical switchboard	Pieces
51	Electrical switch supports	Pieces
52	Electrical wire insulation	Pieces
53	Motor armature	Pieces
54	Other (specify generic name)	(Specify)
Fire and Heat Shielding Equipment and Components		
55	Arc deflectors	Pieces
56	Fire doors	Pieces
57	Fireproof absorbent paper	Short tons
58	Heat shields	Pieces
59	Molten metal handling equipment	Pieces
60	Oven and stove insulation	Short tons
61	Pipe wrap	Pieces
62	Stove lining, wood and coal	Pieces
63	Stove pipe rings	Pieces
64	Sleeves	Pieces
65	Thermal Insulation	Short tons
66	Other (specify generic name)	(Specify)
Textiles and Clothing		
67	Cloth	Pounds
68	Thread, yarn, lap, roving, cord, rope, or wick	Pounds
69	Aprons	Pieces
70	Boots	Pieces
71	Gloves and mittens	Pieces
72	Hats and helmets	Pieces
73	Overgaiters	Pieces
74	Suits	Pieces
75	Aluminized cloth	Short Tons
76	Rope or braiding	Short Tons

Appendix B Descriptions of Codes for Reporting Number of Employees, Asbestos Type, Disposition, Product Type

Code	Name	End Product Unit of Measure
77	Yarn, lap or roving	Short Tons
78	Wicks	Short Tons
79	Bags	Pieces
80	Belting	Short Tons
81	Blankets	Pieces
82	Carpet padding	Short Tons
83	Commercial/industrial dryer felts	Short Tons
84	Draperies	Pieces
85	Drip cloths	Pieces
86	Fire hoses	Pieces
87	Ironing board pads and insulation	Pieces
88	Mantles, lamp or catalytic heater	Pieces
89	Packing and packaging components	Pieces
90	Piano and organ felts	Pieces
91	Rugs	Pieces
92	Tape	Pieces
93	Theater curtains	Pieces
94	Umbrellas	Pieces
95	Other (specify generic name)	(Specify)
Gaskets		
96	Sheet gasketing, rubber encapsulated beater addition	Pieces
97	Sheet gasketing, rubber encapsulated compressed	Pieces
98	Compressed sheet gasketing (other)	Pieces
99	Metal reinforced gaskets	Pieces
100	Automotive gaskets	Pieces
101	Other (specify generic name)	(Specify)
Marine Equipment and Supplies		
102	Caulks, marine	Pounds
103	Liners, pond or canal	Pieces
104	Marine bulkheads	Pieces
105	Other (specify generic name)	(Specify)
Paints, Coatings, Sealants and Compounds		
106	Asphaltic compounds	Pounds
107	Automotive/truck body coatings	Gallons

Appendix B Descriptions of Codes for Reporting Number of Employees, Asbestos Type, Disposition, Product Type

Code	Name	End Product Unit of Measure
108	Buffing and polishing compounds	Pounds
109	Caulking and patching compounds	Pounds
110	Drilling fluid	Gallons
111	Flashing compounds	Pounds
112	Furnace cement	Pounds
113	Glazing compounds	Pounds
114	Plaster and stucco	Pounds
115	Pump valve, flange and tank sealing components	Pieces
116	Roof coatings	Gallons
117	Textured paints	Gallons
118	Tile cement	Pounds
119	Other (specify generic name)	(Specify)
Other Products		
120	Sheet gasketing (other than beater-add)	Square Yards
122	Packing	Pounds
123	Paints and surface coatings	Gallons
124	Adhesives and sealants	Gallons
125	Asbestos-reinforced plastics	Pounds
126	Insulation materials not elsewhere classified (specify generic name)	(Specify)
127	Mixed or repackaged asbestos	Short Tons
128	Aerial distress flares	Pieces
129	Acoustical product	Pieces
130	Ammunition wadding	Pieces
131	Ash trays	Pieces
132	Baking sheets	Pieces
133	Blackboards	Pieces
134	Candlesticks	Pieces
135	Chemical tanks and vessels	Pieces
136	Filters	Pieces
137	Grommets	Pieces
138	Gun grips	Pieces
139	Jewelry making equipment	Pieces
140	Kilns	Pieces
141	Lamp sockets	Pieces
142	Light bulbs (all types)	Pieces

Appendix B Descriptions of Codes for Reporting Number of Employees, Asbestos Type, Disposition, Product Type

Code	Name	End Product Unit of Measure
143	Linings for vaults, safes, humidifiers and filing cabinets	Pieces
144	Phonograph records	Pieces
145	Pottery clay	Pounds
146	Welding rod coatings	Pieces
147	Other (specify generic name)	(Specify)