

M E M O R A N D U M

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Fr: David Andrews & Sonya Lunder
Environmental Working Group

Subject: EWG information requests -- number and type of chemicals with confidential identities

Scott, Thank you for the context you have provided on the treatment of chemicals with confidential identities. As a follow-up EWG would like written answers to the following questions:

1. How many distinct chemicals had the chemical identity claimed as CBI on the 1990 and 2006 IURs? Please tally the total number by each level of production.
2. What number of chemicals on the 2006 IUR for which use information was submitted, indicated "Used in Products Intended for Children" in PART III. Section B.b ? Please report the number for both "total" and CBI chemicals.
3. Please provide us with information about the types of uses for chemicals with identity or use claimed confidential. In particular provide a chemical count for each of the commercial and consumer product categories as outlined on page 4-17 of EPA's IUR Instructions if these are collected (production volume >300,000 pounds) for IUR chemicals.
 - 4a. Please provide a tally of the number of chemicals with confidential identities for each designation of yes, no, or not reasonably obtainable for the category "products intended for children."
 - 4b. Could you also clarify the category designation "products intended for children". EPA's 2006 IUR Instructions could be interpreted as products intended SOLELY for children. Is this the case? Alternatively, would a chemical's use in any of the following products: sofa, twin-size mattress, television remote control, or bathmat qualify as a "product intended for children"?
5. Were chemicals with a confidential identity included in the HPV program? Are they currently considered in the ChAMP program?