

EPA

Moderator: Anna Coutlakis
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Operator: This is Conference #: 9381747.

Operator: Ladies and gentlemen, thank you for standing by and welcome to the CDX registration walkthrough conference call. All lines have been placed on mute to prevent any background noise. After the speakers' remarks there will be a question and answer session. If you would like to ask simply press star then the number 1 on your telephone keypad. To withdraw your question, press the pound key.

It is now my pleasure to turn the conference call over to Chris Gorder. Please go ahead sir.

Chris Gorder: Thank you (Rachel). First I'd like to apologize for technical difficulties. Usually we're pretty infallible but today we seem to have some issues.

My name is Chris Gorder. I'm an environmental protection specialist in the information management division within the office of chemical safety and pollution prevention. I'd like to thank you for your participation in today's CDX registration session. If you experience difficulties during the presentation at this point on, please ensure that your Adobe add ons are enabled as they are necessary to view the slides.

During today's presentation we'll be reviewing the capabilities or rights assigned to each user role, the registration process for the core user roles which consist of the primary and secondary authorized officials and supports and the registration process for the new agent/consultant role. Please note that this role is currently only associated with the section five tool. After

reviewing the modules we will provide you with some resources followed by a question and answer session. Please keep in mind that during – that questions dealing with specific reporting or submission requirements will not be addressed during this session.

I know that many of you are tuning in due to the launch of the new TSCA section five Thin Client tool. The current slide shows the new user roles that will be available to you under the CSPP data flow that were not available when using the downloadable tool. We believe these expanded set of roles will provide you with greater control and versatility in completing your submissions.

I'll now turn the presentation over to Dr. Kathy Schechter who'll be guiding you through the user roles and capabilities associated with each role.

Kathy Schechter: Thank you Chris. Welcome and I'm sorry for any interruptions by technical difficulties. Unfortunately our – the way nature goes.

The first thing I'm going to do is to go over the new roles associated with the Thin Client. As Chris has mentioned, there are actually six new roles. In the previous eTSCA software there were only two roles. So we've expanded things tremendously, and this was because of the fact that we're now going to be in a cloud based environment and we need to have a little bit more control of who can see what information and who has the ability to do certain functions within the system.

So the first one I'm going to start off with is the one where the person has the most control and it would be the person who would be filing for the most part the original notices. So this would be what we call the primary authorized official. The term primary refers to the main submission and any documents associated with the main submission, OK.

Authorized official means any member of the submitting company who's going to have the authority to access documents associated with that company. So the primary authorized official would therefore be any member of a submitting company. And what I mean by any member it could be anyone from the president down to the secretary to whoever in the company that you

want to have access to the software, OK and the documents within the software.

So, this allows for multiple persons from the same company to have access to all documents. That's why we broadened the role of primary authorized official to not just include the one who's going to submit it but also those who want to create the documents. It's up to the company to determine who's going to be a primary AO. We do not police that here at the agency.

So the next question would be what can the primary authorized official do within the software? Technically they have the ability to do just about anything. They can create, edit, delete, submit, download the copy of record, unlock submissions for amending and manage their persons to which they are associated with. That would mean agents consultants or primary support. They can also see all documents that were created for that company whether they were created by other authorized officials of that company or if they were created by agents and consultants.

So, what can a primary authorized official submit? In essence they can submit every document. But what happens when you submit the document their credentials are stamped on that document so therefore, they become the legally responsible authorized official of that notice. And in fact when we give our next webinar it will – we will go through and show you or indicate where that certification takes place to show you that this is now going to be the responsible party for that document.

So technically you could have some secretary or somebody who is a technical contact working for the company that would create the document. And then they would go to the boss and say hey look, the document's finished, go into the system here's the pass phrase and submit the document to EPA. And then the person who submits it will then be the person that EPA will refer to as the authorized official of that document.

So the next role that I want to go over is another role that was created for specifically for the EPA (man) because we wanted to have the ability for persons outside of the submitting company to have almost all authority. The

only thing they cannot do is submit the original notice and that would be what we call the primary agents and consultants. The primary agents and consultants are persons not of the submitting company who are going to work on behalf of the submitting company and are associated with an authorized official of that submitting company. So if you think about the way the software works today the small eTSCA downloadable software, this would be equivalent to the support role.

So what can they submit? A primary agent consultant can do everything than an authorized official can do except submit original notices. And by original notices we mean the PMN form, the biotechnology form, the NOC form and the bona fide. What they can submit would be amendments to the original notice, support documents ...

(Sue): Test data.

Kathy Schechter: Yes, the support documents would include test data, withdrawal letters, correspondences and suspensions. They can also submit what we call the (SNER ACM) which is alternative control measures. And we will go into those at webinars further down the road in two weeks or four weeks.

So our last role with regards to the primary submission would be the support (for), the support role. The support in this instance will be a very limited role and it will be for persons from any company. So that could be either the submitting company or for somebody outside the company that you want to have a limited access within the software.

These persons are not identity proofed so they can quickly get registered and they do not have access to any documents until an authorized official gives them access to that document. So they have very limited role. They cannot create anything and they cannot submit anything. They can only edit.

The next set of roles that I wanted to go over are what we call the secondary roles. These are for persons who want to create, submit letters of support and joint submissions. So for the primary roles it is mostly geared toward U.S. companies. The secondary roles are where the foreign companies would take

a high precedent. But it can be either U.S. companies or non U.S. companies that become secondary officials.

The secondary authorized official mimics the primary authorized official except the only thing that they can create, edit, delete et cetera are joint and letters of supports for PMNs, biotech notices and bona fide. And the same with the primary authorized official, the person who submits the document to the agency would then be the person who has the authority to sign the certification statement of that document.

All right, so what can a secondary authorized official do? Like I said they can create, edit, delete, submit, unlock et cetera joint and letter of support submissions. They can also assign agents and consultants for creating these joint and letter of supports. OK, next slide.

The next one I wanted to go over was the secondary agents and consultants or supports. The secondary agents and consultants and support mimic exactly what happens for the primary agents consultants and supports except it refers to only letters of support and joint submissions.

Now I'm going to hand the talk over to Casey Yeh who's going to be walking you through the CDX registration process. I may interject with Casey because I want to emphasize various parts that are new that you may not have seen before if you have not entered into the software. So, take it over Casey.

Casey Yeh: OK, thank you Dr. Schechter. So this is the CDX homepage which I'm sure most of you may be familiar with ...

Kathy Schechter: Can you speak up a little bit? Speak up?

Casey Yeh: Since it's the interface used to register for TSCA. And so we'll be cover – covering registration with CDX for one of the new CDX registration user roles. So first you'll click the register with CDX button on the top right hand side of the screen to start the registration process. And this will take you to the terms and conditions screen which lists specific conditions and terms that are potentially a user has to agree with before they can proceed with the registration process. So you'll read the terms and conditions and if you agree

with them then you'll select the I accept radio button and click the proceed button.

So on the core CDX registration page you'll select the program service that you want to register under from the active program services list. And section five is accessed under the chemical safety and pesticide and program service. You can go ahead and enter CSPP in the text field and locate your data flow. You click the program service (inaudible) result link and this will take you to the role access screen.

Kathy Schechter: (Inaudible).

Casey Yeh: OK, sorry. Select the appropriate user role that you'd like to register for by selecting a value from the select role dropdown menu which contains the following values; primary authorized official, primary support, secondary authorized official and secondary support. In this case we'll be moving on as if we have selected the primary authorized official role first.

Kathy Schechter: What I wanted to interject here really quickly is that, for persons who want to sign up as agents and consultants they would not be going through this process. They would be getting an email from the authorized official and the registration for the primary agents and consultants or secondary agents and consultants would proceed via the email. So this is only for authorized officials and support registrants.

Casey Yeh: That's correct. So you know after you select your user role you'll click the request role access button. So as you all know you have to enter side information for a section (five form). So it's extremely important that you identify facilities at some point during the registration process.

So on the registration information page you'll enter in the facility criteria for the facility or facilities that will be associated with your organization. So after you enter in your search criteria you'll click the search facilities button to search for facilities.

Kathy Schechter: OK. The other thing I wanted to add into here was that entering the facilities at this point is similar to creating a rolodex of facilities for you to use in the PMN form the NOC form and the bona fide form.

Chris Gorder: And in the (CDR) if you are involved with multiple facilities you'd also want to add all those facilities here so the (CDR) tool will prepopulate your submission screen with those facilities.

Kathy Schechter: OK. So this facility is not just for e-PMN, it's also for (CDR). So if you fill out (CDR) submissions this would also be where you would populate your facilities. Now this includes not just sites controlled by the submitter, but also sites controlled by others so that when you fill out PMN pages eight or 10 it would be your dropdown list would come from, facilities that you have registered here at this. Go ahead.

Casey Yeh: You can also click the continue without facilities button to continue the registration process and identify facilities at a later point within the registration which we'll be demonstrating at a later point. So after you enter your facility search criteria and you – you'll see the search results and you'll check the check boxes for facility or multiple facilities that you'll associate with the organization you're registering for. And then you click the select button to proceed with your choices, and then your list of selected facilities will display. And then click the continue with selected facilities button to finalize your choices and associate the selected facility to your account.

And now we will continue to enter user information that will be associated with your CDX account. Please remember to enter in information for the required fields which any field marked with an asterisk is required. And then later on LexisNexis will pull your information exactly as is the way you've entered it here. So it's really important that you use your full name, no nicknames or anything like that, your middle initial and last name since if you do not enter in your information correctly it's possible you could fail LexisNexis identity proofing.

So after you entering your user information you'll select a security question from the security question dropdown menus and provide an answer. Answers

to these security questions are used if it is ever necessary to reset your account password for example. And then in the organization information section you'll enter the name of the organization that you'll be registering under. If the name of the organization cannot be found, use the advanced search options or you can request that your organization be added. So if you do that, then you will enter your organization information into the fields that are displayed and then you'll click the submit request for access button.

And then this will take you to the confirmation page notifying you that you will receive an email confirmation message at the email address you provided. This email is meant for you to confirm your email address and then complete the registration process. And then just keep in mind that you're not completely done with registration at this point and you must go to your email address inbox to complete the registration process via email. So your confirmation email contains a link to complete the registration process. So you will click the link to complete your registration and this will take you to the CDX log in page.

So on the CDX log in page you'll enter in the user ID information that was newly created a couple of pages ago and you'll click the log in to CDX button, and this will take you to the identity verification page. So on the identity verification page please read the statements to proceed to LexisNexis identity proofing service. Just remember that LexisNexis is a third party identity proofing service that validates your identity. You may find a paper form if you do not want to use the automatic verification process but this will take at least 10 business days to process the paper (ESA).

So you will check the checkbox to indicate you've reviewed the information provided and that's accurate, and then you'll click the proceed to verification button to continue the identity proofing. And then this will take you to a pop up window confirming the identity verification can be conducted by LexisNexis. And so you click the OK button to proceed to the LexisNexis pop up window.

So as you can see, the last name and the first name information that was pulled comes from the CDX registration information you entered. And you'll

enter in the remaining fields and click the submit button. And then a pop up window displays thanking you for completing the LexisNexis verification process and you click the OK button. And this takes you to the identification verification page if you have successfully passed LexisNexis.

So you'll see this screen if you have passed LexisNexis identity proofing and select a unique answer for each 25 one question. And then these 25 one questions and answers are used during the premier certification submission process and during the download copy of record process. And then click the save answers button.

So then you now have the option to electronically find the (ESA). So review your (ESA) and then click the sign electronically button. And then a certification statement pop up displays indicating that you must certify that all the information you provided is truthful and accurate and then review those terms and if you agree click the accept button.

And then this will take you to the e-signature widget and the first step is to enter in your CDX password and click the log in button. Next you must provide the answer to the secret 25 one question that you answered earlier. Enter the 25 one answer and then click the enter button. And then the last step is to sign the file by clicking the sign button. And so then now your user role is active and clickable on the my CDX page and so you can click the user role link within the role column for your program service to log in.

Kathy Schechter: I wanted to add something here. I don't remember if it's in the rest of this bulk or not. You can chime in Casey if you want to.

If you've already registered and you wanted to change your facilities or add to your facilities you can go to the manage your program services on the my CDX page at this point.

(Sue): So we do show that later ...

Casey Yeh: We cover that.

Kathy Schechter: OK.

Casey Yeh: Yes.

(Sue): (Inaudible) later.

Kathy Schechter: So we'll go through that on how to add any of your facilities from this page.
Right.

Casey Yeh: OK. So for now we'll just cover the process of adding additional user roles such as the secondary authorized official role to your same CDX user ID.
OK, so from here you can – from here you can add additional roles under the CSPP program service such as the secondary authorized official role.

So you click your manage your program services button which takes you to the manage program services page. So on the manage services program page you can also see which roles you are registered for under a specific program service by clicking the applicable program service link. So then you'll click the request new role link to add a role for a specific program service. And so this takes you to the request a new role page. And then you'll select a user role you'd like to add from the select a role dropdown menu and then click the add selected role button.

And so here you'll just kind of the same steps as before. You'll you know identify a facility that you'd like to associate the organization with. You can enter in your facility search criteria and then click the search facilities button. You know check the checkbox for any facilities you want to add and then click the select button.

Kathy Schechter: And if you do not find a facility and there is a create new facility option.

Casey Yeh: And we'll cover that also, yes. So then your selected facility you know if they exist just (on that) page then you can click the continue with selected facility button to finalize the facility choices you made. And so this takes you to the manage program services page with the new role added to the program service.

So next we'll cover how to add multiple organizations to a CDX account.

Kathy Schechter: This comes into play when for example your company may change its names. It gets bought, it's sold et cetera. You may have to alter your account to change or add an organization.

Casey Yeh: OK. So you'll navigate to the my profile page and then from here you can add additional organization if it's necessary. So you click the modify user/organization information button. So in the organization information section you can search for or add an organization. And then here you can after you add an organization you can identify one or the other as your primary organization.

So after you enter in organization information you can search and then click the link in the organization ID column which displays the organization information fields. Enter in the required organization and user information and click the submit request for access button. So next we'll cover how to add facilities to an existing CDX user ID.

So to add facilities to an existing user role you log into CDX and click the manage your program services button on the my CDX page. So this takes you to the manage program services screen. And then click the CSPP program service link to display the user roles registered for a program service and click the manage facilities link to add facilities associated with the user role.

So then on the manage facilities page you can view any facilities that are already associated with the user role or add facilities to a user role. So you'll the add additional facilities link. So you'll enter in your facility search criteria for the facilities that'll be associated with your organization and then click the search facilities button.

So on the facilities search results page, you can check one or more facilities you want associated with and then click the select button. Or if you do not see your facility click the create new facility button. So then you know, you'll see your selected facilities display at the bottom section of the manage facilities page and click the save selected facilities button to confirm the facility choices. And so now your selected facilities display on the manage facilities page and are now associated with the user role and organization.

So say you search for a facility and you don't see what you're looking for from the facility search results page. The option is also available to create a new facility. So you can click the create new facility button to begin the process of creating a new facility to associate with the user role. So you'll enter in the new facility information into the create facility field and then click the next button. You can review the facility information you entered and then click the select button to confirm the new facility information.

So here the newly created facility displays within the selected facility section. At this point the facility won't have an EPA registry ID but it will soon be generated upon you know saving the facility to your user ID. You'll click the save selected facility button and then facilities that are associated with the user ID are displayed on the manage facilities page. And you'll see that the facility that you just created has like a user ID now, an EPA registry ID now. OK.

So next we'll cover the process of registering for a support user role including primary supports and secondary supports, OK. So you'll start on the CDX log in page again and you'll click the register with CDX button. You'll review the terms and conditions and select I accept and click the proceed button. And then on the core CDX registration page (inaudible) program service CSPP and then you'll click on the CSPP program service result link and this takes you to the registration information screen.

So then on the registration information screen you'll select primary support from the select role dropdown menu and then click the request role access button. This takes you to the registration information screen where you identify your authorized official. So enter the authorized official user ID into the text field and then click the next button. And this takes you to the registration information screen where you will select the corresponding organization you should be associated with.

So you'll select the radio button next to the organization that you will be associated with and then you'll click the next button. This takes you to the registration information screen where you provide your user information. So entering user information, search for and select an organization if you need to.

And then after clicking the organization ID link enter information in there in the organization information fields and click the new request for access button. And then a confirmation page displays indicating that you'll receive an email with a link to activate your account. And then after you click the activation link within the email and you log in, the primary support link displays as active and clickable within the role column for your CSPP program service.

So next we'll cover the process of role sponsorship for a primary agent/consultant. So as Kathy mentioned before, the process of registering for agent consulting is a (inaudible) registration process which means that a sponsoring AO must first identify a user as a potential agent/consultant. OK.

So to begin, if you were a primary AO you would click the role sponsorship tab displayed near the top of the my CDX page. This takes you to the role sponsorship tool screen. Current AO – current users may initiate the role sponsorship tab by deactivating and reactivating their account. But any new AO users will automatically be granted access to the role sponsorship tab.

So the process starts when a sponsoring AO identifies a user as a potential agent/consultant and enters his or name and email address into CDX. The potential agent/consultant receives an email notification of the invitation and logs into CDX or creates a log in if they don't already have one and accepts or rejects the sponsorship offer. The AO then approves sponsorship of the agent/consultant CDX log in identity and the agent consultant verifies the sponsorship relationship in CDX.

And then the following are just some notes regarding agent consultant access to reiterate. So an agent consultant may support either a primary AO or a secondary AO. An agent consultant may be sponsored by multiple AOs from multiple organizations.

Sponsors will not see other sponsor's forms of an agent consultant. An agent consultant can only see the forms that he or she creates or that his or her sponsor gives access to and can only open forms that he or she has the pathways for. And then lastly, if a sponsor leaves a company the agent

consultant loses access to the company's forms and must find a new sponsor at the company.

So next I'll turn it over to (Kathy) for some frequently asked questions answers.

Kathy Schechter: Thank you Casey. When we first did this presentation a couple of years ago we had put together some question and answers and decided to present them because that would be the easiest way for you to understand where they're a part of this process that need emphasis. So I'll go over them. After we're done with this we'll open the floor for any questions from the audience. So if these questions that they have already going in their minds is not – are not answered by these questions and answers, they can present those questions at that time.

So the first one, do I need to register with CDX to work on section five notices? In the current software the eTSCA software we had two versions. We had a light version where you did not need to register and you had a what we call the heavy version or full client version where you had to register with CDX to obtain that software. Well because our new system is now going to be in the cloud in CDX that means you do have to register and become approved as one of the roles before you can access the software.

The next question is what is LexisNexis? And that's a third party identity proofing service that most people who are in the United States who have a Social Security number should be able to pass the validation. That would mean a lot of non U.S. persons will most likely not pass LexisNexis validation so be aware of that. So if you have a company who's overseas that wants to start the process, have them start early because they may have to do a paper version of identity proofing. And that will take a lot longer than using the LexisNexis.

So if I do not pass the identity proofing what do I have to do? The system will generate forms for you to sign and mail. They are very similar to the forms we do today with the eTSCA client.

So I'm a non U.S. person, how is my identity verified? Like I said, most non U.S. persons will most likely not pass LexisNexis. It deals with Social Security numbers of persons living in the U.S. So be prepared for submitting paper verification forms.

Do support users need to have their identities verified? The answer to that is no. Casey went through the registration for support persons and it was very quick, very simple. They're very easily processed in registration. The reason for this is because they have a very limited role within the system. They do not submit anything and so therefore they do not need to be identity proofed.

OK another question. If I have been approved for the eTSCA workflow do I need to reregister in CDX for the new workflow? The answer to that is a little bit complex. When you are registering for the Thick Client software you'll sign up for the TSCA program service. When you are moving over to the new system you have to go into CDX, add a program service for the CSPP workflow.

If you have already gone through your identity proofing and submitted your electronic signature agreement to recertify or resign but that can all be done electronically. So hopefully it will go a lot smoother and you can quickly add in your new workflow. You will also have to add in your role user role.

So not only do you add in the workflow, you have to re-add in your user role. So for those who are authorized officials will most likely become primary authorized officials unless you are a letter of support person and then you have to sign in as secondary authorized official. Agent or consultant, then you will have to wait for the invitation from the authorized official and then you can go through that.

The next question, what role should I register in CDX? We have a user guide that goes through all of the information that we discussed today. Hopefully that will help you along with this webinar to determine what role you should be signing up for. If you have any other questions always feel free to call.

Can I have more than one role in CDX? The answer to that is yes, you can have more than one role. You can be an authorized official, primary

authorized official as well as a secondary authorized official. If you're an agent consultant you can be an agent consultant for multiple organizations. You might become a support registrant for another authorized official. It all depends on what role that you need to play.

So what does primary mean? We went over that the fact that primary refers to the main submission and documents associated with that main submission. And what I mean by that is the PMN form, the biotech form, the support forms, the NOC forms, the bona fide forms and the alternative control measures notices. These are all accessed using the primary functions, the primary authorized official. If you want to do letters of support or joint submissions then you are going to be signing up for a secondary role. So the secondary refers to companies submitting information in support of the primary submission with regards to joint submission or letter of support.

So what functions can a primary authorized official perform? That was mentioned earlier. The primary authorized official has the ability to submit everything. Can edit, delete, unlock et cetera. They can also assign agents and consultants and assign support persons to work on their documents.

(Sue): (Inaudible).

Kathy Schechter: They can also download the copy of records. That's very important. Never leave things in the cloud. Always keep a copy locally. We'll go over all of that during these discussions and the next webinars.

Who can create and submit support forms? It used to be that support registrants were meant to support forms. Well, support forms can be submitted by agency consultants, it could be submitted by authorized officials. So any of those persons can a submit support form.

The next question, what organizations should I register? Now this is a little bit tricky. And what I mean by that is the CDX system is company centric or organization centric. So that means that when you log in and you have multiple companies, you need to select which company that you want to do your information and submissions for.

When you select that company you will see in your form screen all the information, all the documents that were created by that company for that company. So that means that if your organization or your company changes hands and you need to register under a different organization, you should keep track of your old information under the old organization name and the new information would go under the new organization name. So you will probably have multiple places where your information's going to be stored so be aware of that. It's all company centric.

So the organization is very important as to how you represent it in the system. Any AO who's registered for that organization will have the ability to see all the documents for that organization. That's where we come in for multiple AOs.

So can I register under more than one organization? The answer is yes. But like I said, the documents will be associated to that organization and they will not be transferred to the new organization. They will always remain under the old organization. (That's a) FYI.

Next question, if my organization changes name how do I access the old one? Like I said I just mentioned that. It's always best to download your copy of record and maintain your documentation outside of CDX just in case something happens. But like I said, the system is company centric so old information will be stored under the old company name and new information will stored under the new company name.

So do I need to have multiple IDs to serve as multiple – as an agent consultant for multiple organizations? And the answer to that is no, you do not have to have multiple IDs. You can have one CDX log in that will fit all of your needs. It will allow you to have multiple roles, it will allow you to have multiple organizations and it will allow you if you're agent and consultant to be associated with multiple authorized officials.

Anna Coutlakis: May I ask a question?

Kathy Schechter: Sure.

Anna Coutlakis: What is it that agent consultants can see when they go into (the explorer)?

Kathy Schechter: OK, this will be stressed in the next webinar. But when an agent and consultant signs in and they log into the forms screen what they will see are documents that they created themselves or documents than an authorized official has appointed to them. They will not see documents that other agent and consultants for that organization have created. They won't see documents that authorized officials have created for that organization unless they give them access.

Anna Coutlakis: Pass phrase will allow them to see end of the document?

Kathy Schechter: Correct. Pass phrase will allow them to see end of the document, the form screen will filter out only those documents for which they are allowed access to. OK.

So the next question, how are facilities within a PMN identified? The facilities are entered in CDX registration and are associated by organization. And then when you go to the specific forms you will have a little button that says add site. You will select the add site and it will give you a dropdown of the facility that you have entered in your registration. So user registration as a way to store or organize the facilities that you plan on selecting either in the PMN form, the NOC form or the bona fide form.

Anna Coutlakis: I have another question?

Kathy Schechter: OK.

Anna Coutlakis: What do you recommend for pass phrases in companies?

Kathy Schechter: Once again that we'll go over next time more so than this time. But while you are registering, it wouldn't be a bad idea to start thinking about the pass phrase. And what we mean by the pass phrase is that every document that gets created within CDX is encrypted with a pass phrase. And the reason why it's nice to discuss this now is because, you should determine how you want your pass phrases to be for your company because a pass phrase is not something that can be recovered.

If the pass phrase is lost or if the pass phrase is forgotten, that document will become unreadable and it cannot be reset. So while you are registering and you get all of your persons registered, start thinking about how you want your pass phrase to be organized. It could be that you have one pass phrase, it could be that you decide to have some other system for pass phrases that have – you know I'm not telling you how to do it. That's up to you.

But it should be something that's easily remembered, something that you can pass along if somebody leaves the company. Maybe they leave quickly, maybe they don't keep track of their documentation. While you are deciding who are going to be authorized officials and agents and consultants make sure you have a method for your pass phrase, OK.

And lastly we just have some contact information. We are going to be downloading or uploading I guess you could say the presentation as well as – the verbal as well as the slides on the new chemicals website. If you have issues with registration or you have questions about how to use the software, feel free to contact the CDX helpdesk either by phone or by email. They will also be able to help you in any way, shape or form.

Any other questions from (Anna)? This was Anna Coutlakis who's asking questions. We will now open the floor for general questions. The moderator will help to organize how the questions will come in.

We also will allow for questions to be received via email. So what was the email address for that?

Chris Gorder: etscareporting@epa.gov.

Kathy Schechter: OK. It's one word; etscareporting@epa.gov. So if you have any other questions feel free to submit to our eTSCA reporting email address.

Operator: Thank you. Audience over the phone lines, to ask a question or make a comment please press star 1 on your telephone keypad. We'll pause for just a moment to compile the Q&A roster.

Your first question comes from the line of – your first question comes from the line of (Claire Scott).

(Claire Scott): Can you hear me?

Kathy Schechter: Yes we can.

(Claire Scott): Oh, it works. How about that? OK, here's a scenario. I am currently the person that puts all the forms together, does all the you know supporting documents attachments whatever. I send them to our CEO who is the authorized official and he submits them electronically.

However, I am also the technical contact and I am able to submit you know changes to (MFDF), changes to documents if I screwed up and have a typo or did something wrong. I can do all the amendments and support documentation. I am not an authorized official. Do I need to become one in order to keep that capability?

Kathy Schechter: If you are the person that's associated with the submitting company, in other words your CEO is the same company as you, correct?

(Claire Scott): Yes, it's my boss.

Kathy Schechter: Just double checking. You never know.

(Claire Scott): No, no, no. No I'm not I work ...

Kathy Schechter: You can become an authorized official. We are expanding the authorized official role to not only include the big boss or whoever you term as the big boss but also others who want to act like the big boss. Now what you would do is be the authorized official, the primary authorized official. You would create any of the documents you want to create but then you would contact the CEO and say hey look, this is ready for you to submit. And he would go into the system he would take the pass phrase that you give him, open that document and submit it to the agency.

(Claire Scott): So I have to have my own pass phrase?

Kathy Schechter: The pass phrase is for the document. So that means you created if you create the document you would pass along that pass phrase to the CEO so he can now open the document.

Kathy Schechter: Oh, so each document's going to have to have its own pass phrase?

Kathy Schechter: That's right.

Anna Coutlakis: But they all can have the same pass phrase if they want.

Kathy Schechter: That's why – if you want you can have the same patch phrase for every document.

(Claire Scott): I see.

Kathy Schechter: So ...

(Claire Scott): So the difference is I used to be able to just you know work in the software save it to my hard drive, work in the software save it to my hard drive. Then when it was ready I'd email it to him and he would submit it and that's the last I saw of it unless I needed to amend it.

Kathy Schechter: OK, now ...

(Claire Scott): In order to work in software I'm going to have to be an authorized official?

Kathy Schechter: You can, yes. You'll be an authorized official.

Anna Coutlakis: Are you a member of the (inaudible)company?

Kathy Schechter: (Inaudible). OK.

(Claire Scott): What if I don't want to be an authorized official?

Kathy Schechter: You are an authorized official in CDX.

(Claire Scott): Yes.

Kathy Schechter: You are not an authorized official on the form EPA receives. There's a difference. You are not the certified ...

(Claire Scott): Right, I'm not the submitter. I am not the submitter.

Kathy Schechter: So EPA will never know what role you are in CDX.

(Claire Scott): OK.

Kathy Schechter: All we know is that the document was submitted by this particular authorized official and for the original notice that would be your boss.

(Claire Scott): OK. So would I be a secondary authorized official?

Kathy Schechter: Not unless you want to do a joint or a letter of support.

(Claire Scott): Well letters of support I might have to send in to support a submission. In the past my boss has always submitted it but then if there's any problem with it I just deal with it.

Kathy Schechter: OK.

(Claire Scott): So what do I need to be primary, secondary? Does it matter?

Kathy Schechter: If you are doing the primary e-PMN form you would be a primary authorized official.

(Claire Scott): In other words creating one?

Kathy Schechter: Correct, if you're doing the PMN form. If you are creating a letter of support for a main submission or a letter of support or a joint submission for a main submission then you would have to add a secondary authorized official role to your profile.

(Claire Scott): OK let's say I become a primary. I create the thing I send it to my boss. He's a primary. He submits it then there's something wrong with it. You know there's something that they have to contact you know they have questions.

Mostly it's like your (MSDS) needs to be amended or blah, blah, blah or your form you forgot to check something on it you know.

Kathy Schechter: Correct.

(Claire Scott): And I just have to – would they contact him or would they contact me?

Kathy Schechter: It's always the technical contact listed on the form that gets contacted.

(Claire Scott): OK. So I will need that secondary ability as well in order to ...

Kathy Schechter: No, the secondary is only joint and letter of support. So what you would do as a primary authorized official and a technical contact you would be contacted to say hey look, your submission has this problem. We need for you to amend it. Then you would log into the system under a primary authorized official, unlock that submission, make the changes and resubmit.

Because you are an authorized official you can submit what we call amendments.

(Claire Scott): Right.

Kathy Schechter: You will not be considered the certifying authorized official. That would be the first person who submitted the document.

Anna Coutlakis: The original document.

Kathy Schechter: The original document.

(Claire Scott): So when I create the document I create the pass phrase. I send the pass phrase to my boss, he submits it. If anything needs to be changed I still have the pass phrase. It's the same pass phrase?

Kathy Schechter: Correct. Right. Same pass phrase. You'll be able to go in, make changes and resubmit.

(Claire Scott): OK, thank you.

Anna Coutlakis: (Claire) you are – are you an agent consultant or are you with the ...

(Claire Scott): I'm an employee.

Kathy Schechter: She's an employee.

Anna Coutlakis: OK, got you.

Chris Gorder: Real quick, if anyone submitted a comment during the presentation that was not addressed please bring it up now as we can't pull those comments out of the communication box.

Kathy Schechter: In other words they'll have to speak up.

Anna Coutlakis: Yes.

Kathy Schechter: OK.

Operator: And as a reminder in order to ask a question or make a comment, please press star 1. Your next question comes from the line of (Dan Dare).

(Dan Dare): Hi. Can you hear me?

Kathy Schechter: Yes we can.

(Dan Dare): So if we use a toll facility for production, does that toll need to be registered though it belongs to somebody else?

Kathy Schechter: That's correct. You would add to your facility list any facility that site specific facility that you want to enter in the form. So that would mean sites controlled by the submitter including your own sites and toll sites or sites controlled by others that you may have site specific information for. So that would be manufacturing sites, processing sites and used sites.

Operator: Your next question comes from the line of (Sandra Podalack).

(Sandra Podalack): Hi, I think you already answered my question that you can have more than one primary authorized official per company.

Kathy Schechter: That's correct. It's encouraged.

(Sandra Podalack): OK. And then also the email address you gave was
etscareporting@epa.gov.

Kathy Schechter: That's correct, one word. E-T-S-C-A-R-E-P-O-R-T-I-N-G@epa.gov, yes.

(Sandra Podalack): OK.

Chris Gorder: Just as a – just as a note, if you would like the authorized officials of your
company to see all of the submissions, they need to register for the exact same
company under the exact same ID not ...

Kathy Schechter: Exact same spelling.

Chris Gorder: Not CDX (inaudible). Yes, the exact same spelling if they're off and they're
different – and they're given different facility IDs you will not have that
connection.

(Sandra Podalack): OK, thank you.

Anna Coutlakis: So are you saying that the facilities are tied to ...

Kathy Schechter: To the organization.

Anna Coutlakis: To the reporting organization?

Chris Gorder: Yes.

Anna Coutlakis: OK.

Kathy Schechter: Yes, I think in (CDR) they had some issues with that. You really have to be
exact in your organization name to make sure that they all match up.

Chris Gorder: And if they have – if the first registrant gets the facility ID number you can
search their facility ID and that's probably the best way to do it.

Kathy Schechter: Best way to do it.

Anna Coutlakis: OK.

Operator: Your next question comes from the line of (Beth Stife).

(Beth Stife): Hello Kathy.

Kathy Schechter: Hi, good afternoon.

(Beth Stife): Good afternoon. My question is regarding the facility management tool. I registered I moved from a facility within the company and so my facility address changed. So I entered in (inaudible)

Kathy Schechter: We lost you.

(Beth Stife): Hello.

Kathy Schechter: Yes we can hear you now.

Anna Coutlakis: We lost you for a minute.

(Beth Stife): OK. I went to the management program services to enter in the new address however it's still pulling in the old address when I submit the TSCA (AE) submissions. And the old address I've gone through CDX helpdesk. Can you give me any recommendations on how to correct that?

Kathy Schechter: I'm just going to say so (inaudible) I've been chatting with a few folks here. So there should be a way when you're in CDX when you access those facilities for you to edit a facility. That's actually one of the new enhancements that we've done to CDX recently. You should be able to edit that facility address right there within CDX. Are you saying it's not pulling into the actual application when you're going in there?

(Beth Stife): Correct. When I go in to submit an (AE) it's still pulling in the old address. And the CDX helpline told me I needed to add a new address and register that but that still didn't show up.

Kathy Schechter: Are you using the new application or are you using the older TSCA Thin Clients?

(Sue): For (AE) ...

Kathy Schechter: Or you're using (AE)?

(Sue): Yes (AE) ...

Chris Gorder: When you – when you select you're going to use the authorized official role under CSPP do you get a pop up window that lets your user role and facility or company?

(Beth Stife): Yes, yes. It says primary authorized official.

Chris Gorder: Yes. When you – when you click on that link do you get a pop up? Because usually if you registered for more than one facility you'll get a pop up and the pop up will have a dropdown list within it that will let you choose which facility under CSPP authorized official role you'd like to use.

(Beth Stife): Oh no, I don't get that.

Kathy Schechter: No you wouldn't, no you wouldn't. That's only for organizations. What I would do – I'm sorry I don't I didn't catch your name. But what I would probably recommend for you to do is email the – if you don't mind Chris if she emails the eTSCA reporting email address. Chris can route it to us. We can have someone get in touch with you if the CDX helpdesk wasn't able to help you. I can have one of our – one of our analysts from (TGI) just contact you directly and help you – and help you out.

(Beth Stife): That would be great. Thank you very much. I'll do that.

Kathy Schechter: All right, thank you.

Chris Gorder: Thank you.

Operator: Your next question comes from the line of (John Cowalsky).

(John Cowalsky): Hi, I actually have several related questions.

Kathy Schechter: OK.

(John Cowalsky): OK, the first one is did EPA receive any adverse comments on the direct final rule of July 20th?

Kathy Schechter: We can't reveal anything about that right now.

(John Cowalsky): OK. You're not at liberty to reply. Is that what you're saying?

Kathy Schechter: Correct.

(John Cowalsky): OK. Let's assume for the moment that you did not, then the use of the Thin Client would be mandatory after January 19th 2016.

Kathy Schechter: That's correct.

Anna Coutlakis: That's correct.

(John Cowalsky): OK but ...

Kathy Schechter: And so you can use either methods.

(John Cowalsky): Prior to that the Thick Client is still acceptable?

Kathy Schechter: Correct.

(John Cowalsky): OK. Will a user be able to register through CDX for the Thick Client within that timeframe?

Kathy Schechter: Yes. The registration is still open with both softwares both the Thick Client and the Thin.

(John Cowalsky): OK. And you answered the question but I'm going to nonetheless explain why I asked just to make sure my understanding of your response is clear. As a consultant, I'm right now I'm already working on documents for clients using the Thick Client and those clients have never registered in CDX before. So what I want to make sure is that if I provide them with draft forms prepared using Thick Client that they will in fact be able to register for the Thick Client to submit those finalized and submit those forms.

Kathy Schechter: Yes, they can do that up until January 19th. But be aware that if they are going to do submissions in the future it wouldn't hurt for them to go ahead and get the other CDX registrations for the CSPP workflow also in place.

(John Cowalsky): OK, thank you. That's worth noting. Finally, would everything that you said apply to a (poor) manufacturer as well who would be submitting a letter of support?

Kathy Schechter: Correct.

Anna Coutlakis: Correct.

(John Cowalsky): OK. Thank you very much. Do you – can you (inaudible) not you know whether or not EPA received those adverse comments?

Anna Coutlakis: You know, we don't know that we got any comments. We haven't seen any comments.

Kathy Schechter: We haven't – we haven't (heard these) so we don't know.

Anna Coutlakis: So you know the comments have come in but they haven't at least been presented to us. So we're telling you not that there are no adverse comments, we just haven't seen any comments as yet.

(John Cowalsky): You haven't seen those comments. So the possibility does remain that you know everything you've covered to this point could change?

Anna Coutlakis: True if that – those comments come in.

(John Cowalsky): OK. Thank you very much.

Operator: Your next question comes from the line of (Pat Resoto).

(Pat Resoto): I am curious because I (accepted) the documents as company centric. What recommendations would you have to make sure that a company which has purchased another or is merging with another have access to all the documents it would need from the older company?

Kathy Schechter: Well, what I've said with the Thick Client is something I'm going to reiterate for this new software. Don't rely on the cloud to store all your documentation. It always best to download the copy of record so you don't have to rely on what's in the cloud.

If it turns out that you can't have access to the old documents via CDX, then you should have access to the copy of records that you've downloaded. And if not you can request copies from EPA.

Anna Coutlakis: Does that make sense to you (Pat)?

(Pat Resoto): Yes. Thank you.

Kathy Schechter: I mean try to keep your records from the old companies and the new company. But that's you know we cannot change documents within CDX from one company to another.

(Pat Resoto): Thank you.

Operator: And as a reminder, in order to ask a question or make a comment please press star 1. Your next question comes from the line of (Hishan Silverman).

(Hishan Silverman): Yes, hello. Can you hear me?

Kathy Schechter: Yes we can.

(Hishan Silverman): OK. I was the authorized official for a previous company and I left the company and I moved to a new one now. And I'm not really sure – I have not submit myself a request to remove me from that company as a sign in on CDX when we did the (CDR) last time. Now, do I need to register with the new company or what is it that I need to do exactly?

Kathy Schechter: Well, you should keep your CDX registration accounts current meaning that if you have an old account and you're no longer with that company you should probably deactivate that account. Sign (out) for that account for that company, yes. Re-add it in the organization for your new company and make sure that that's your active account is for the new company.

(Sue): Yes just to add on to that, what you can do is if you still have access to your old CDX account ...

(Hishan Silverman): Yes that's I have to look for that.

(Sue): Right, so if you have that access you can remove your old company that you used to submit the CDR and then you can add an organization a new one for the new company that you work for now.

(Hishan Silverman): Oh I see, OK. But if I ...

(Sue): (Inaudible) your CDX registration then this doesn't matter and you just need to register for a new account in CDX.

(Hishan Silverman): OK, OK. Great, thank you.

Operator: Your next question is a follow up from (Claire Scott).

(Claire Scott): Hi. OK, sorry I should have asked this before.

Anna Coutlakis: That's OK.

(Claire Scott): The difference between the Thin Client and the Thick Client. Right now in the Thick Client software you know I have these profiles created that are always somehow populated in it every time I open it to create a new form. So that you know as you're going through the form and you have to fill out the facility address and my authorized official's name and address and phone number and all that, I just pick the profile.

So is that still going to be a functionality of the Thin Client and will it be based on the facility that I enter when I register?

Kathy Schechter: OK, well it's a twofold thing. There's the people information storage and then there's facility information storage. When you fill out the submission, the authorized official is populated automatically. You do not have to fill that in. So the person that pushes the button that information will automatically fill in.

(Claire Scott): Oh, I always fill it in.

Kathy Schechter: Well now it's going to be whoever pushes the button that's the one to submit.

(Claire Scott): So I don't need to even populate those fields?

Kathy Schechter: No, not for the authorized official.

Anna Coutlakis: That's interesting.

(Claire Scott): OK.

Kathy Schechter: That's automatic, OK.

(Claire Scott): Right.

Kathy Schechter: For any other person like agents and consultants or technical contacts, we have the ability to do one of two things. You either hand enter it or if it's you whose information that's going to be entering in this field there's a copy from CDX option. So if you are the technical contact and you created the form, then you can push that button copy from CDX for the technical contact and it'll populate your information.

(Claire Scott): Oh. Because in the – in the old version you know there was a profile and a dropdown I ...

Kathy Schechter: Correct. We do not have that option now.

(Claire Scott): OK.

Kathy Schechter: Most submissions are like I said are submitted by the authorized official so that information is automatic. But the people who usually fill out the form are the technical contact.

Anna Coutlakis: How about agent?

Kathy Schechter: And agent consultants.

(Claire Scott): Agent.

Kathy Schechter: So that would be a quick population of their own information so.

(Claire Scott): So if I say select from CDX it's going to know to select my information? It's not going to pull (Scott's) in, is it? I mean my boss. My last name's (Scott), his first name's (Scott). Don't be confused.

Kathy Schechter: All right well, we'll gnaw over that more when we talk about filling out the form in two weeks.

(Claire Scott): Oh, we are going to go over that in a – in a subsequent ...

Kathy Schechter: Correct.

Anna Coutlakis: We are going to have two more webinars just so you all are aware of it.

(Claire Scott): Yes, I am aware of it. I just (inaudible) (with the recovery).

Operator: Once again to ask a question or make a comment, please press star 1. Your next question comes from the line of (Susan Erb).

(Susan Erb): Yes. A person from my sister company will be the primary authorized official to enter PMN et cetera for our company. Do we need another primary authorized official from our company to do submission of the PMN?

Kathy Schechter: Your voice is breaking up, it's not really that clear. Can you repeat that?

(Susan Erb): Sure. A person from our sister company will be the primary authorized official to enter PMNs et cetera for our company. Do we need another primary authorized official from our company to submit the PMN?

Kathy Schechter: It depends on whether or not they are the same person to submit. If they are a different person then yes, each person would need to register with CDX under that company name.

Anna Coutlakis: A small company may have only one AO and he would do everything. Bigger companies can have a lot of AOs. But all of them can't certify and submit but the – it's internal to the company as to who are those certifiers.

(Susan Erb): OK. Well we're officially separate companies.

Kathy Schechter: Then the question would be do you have the same company name?

(Susan Erb): No.

Kathy Schechter: Then you should probably have those persons register as an agent consultant for the main company.

(Susan Erb): OK.

Kathy Schechter: Therefore they can do everything except submit the original notice.

(Susan Erb): OK. All right, thank you.

Operator: Your next question comes from the line of (Levi Howl).

(Levi Howl): Hello. My general question is regarding the internet source the website itself. Is there any recommended parameters or specifications I must follow like use Explorer 9 versus Explorer 10 or do you have to use a specific browser in order to be able to access the website sufficiently?

(Sue): Yes, so this is (Sue) again. We support from an IE perspective we support nine and above so nine, 10 and 11. We also support Google Chrome which I recommend. I think that works the best when we're – when we're using it. Firefox works, Fireworks. So it's pretty open in regards to browsers.

I believe there's – I don't know it off the top of my head, but we do have user guides that in the beginning of those user guides it does have additional information or recommendations and settings that you should have while accessing the applications. But for the most part it's as long as you're using – if you're using IE as long as you're using the version nine and above it should work just fine.

(Levi Howl): OK, thank you.

Operator: Your next question comes from the line of (Ron Alton).

(Ron Alton): Hello. I have two questions. The first one's very quick. Are there going to be any issues associated with transitioning to Windows 10?

(Sue): No.

Kathy Schechter: There shouldn't be, no.

(Ron Alton): OK. The second is, as a consultant I usually deal with a sort of constellation of people within a client company. There's a person – and I want to sort out what the roles of these different people should be as I have to advise them on what they have to do to get ready to be part of the team. There's my primary contact who is usually not the person who is going to certify. So I now understand and that would often be a high official.

So now I understand that both of the two parties I've mentioned would be – would likely be authorized officials and that's fine, primary authorized officials. But that my primary contact will want to – well in the old days circulate a PDF of the draft form here and there in the company to get people to look at it and one thing and another. In this new world each person in the company and there might be several that my primary contact wants to take a look at it and make sure they're happy with some aspect of it in a review sense or to see it so they understand what information is being requested. It's not clear to me what role those people would have.

Have I described two authorized official and a – and a handful of something else? What are the – what would that look like? What I say to my friends that they would need to do in that circumstance?

Kathy Schechter: Well the question I have for you is do you still want to create the PDF and have them see the PDF? You can still do that without having them register.

(Levi Howl): Oh, OK.

Kathy Schechter: So technically it's all – it should probably be limited to those persons who need to have access to the document for editing or you know for the most part. If you wanted to you could still do a PDF of the draft, submit that for review et cetera.

(Levi Howl): OK.

Kathy Schechter: It might be easier than to get them registered if they don't really need to have an active role in the document.

Anna Coutlakis: Otherwise you have a lot of AOs running around.

Kathy Schechter: Or supports and stuff, yes.

(Levi Howl): OK. But for any of them that needed a more active role that they could be they would likely be AOs. So we would have perhaps even five or six AOs on a single project and they would work out among themselves who is really going to exercise their authority to go in and edit.

Kathy Schechter: Correct.

(Levi Howl): Because that would have to be controlled obviously.

Kathy Schechter: Or you could give them support roles if you want to limit their access.

(Levi Howl): That would be the primary support role?

Kathy Schechter: Correct.

(Levi Howl): OK. It's beginning to make a little bit of sense. Thank you very much.

Kathy Schechter: Sure.

Operator: As a reminder in order to ask a question, please press star 1. Your next question comes from the line of (Nicole Foctoad).

(Nicole Foctoad): Hi, thanks for taking my question. I just wanted to validate that I heard that you can't have both versions. So in other words once you go to CSPP you're giving up your old version so everyone goes whole hog at that point. Did I hear that accurately?

Kathy Schechter: No.

Anna Coutlakis: No.

Kathy Schechter: No, you can have – you can still register for either workflow up until at least January 19th. The Thick Client software at that point will be still available but you will not be able to submit using the Thick Client after January 19th.

(Sue): It's also I guess important to note that we are not going to I believe support any updates to the Thick Client after January 19th. So since that's a downloadable software, what you have is what you get. And so I know a lot of people are going to you know prepare their package within the Thick Client and then upload it into the new Thin Client which we'll definitely discuss in the next week. So two weeks from now there could be more information on that but it's available for you to use but we're not going to support it anymore so.

Anna Coutlakis: After January 19th.

(Sue): That's right.

Anna Coutlakis: Does that answer your question?

(Nicole Foctoad): I think it does. Great, thank you.

Operator: Your next question comes from the line of (Robin Heath).

(Robin Heath): Hello there. I got two brief questions. Firstly there used to be a facility for at least submitting a paper application to transfer responsibility for a PMN from one company to another. We saw that in use when overseas companies closed their U.S. subsidiaries and wished to transfer their PMN to us.

Is there any electronic facility for that? Hello. Hello.

Operator: Ladies and gentlemen, I do apologize. There will be a slight delay in today's conference call. Please hold and the conference will resume momentarily.
Thank you.

Kathy Schechter: That was (Robin Heath).

Anna Coutlakis: (Inaudible).

Kathy Schechter: Yes.

Operator: Ladies and gentlemen, the conference call has resumed. Please press star 1 to come back into queue to finish your comment sir. I'm sorry, that gentleman did not come back into queue but we do have a follow up from (Claire Scott). Please go ahead.

(Claire Scott): Thank you. Hi, OK sorry for all the questions.

Kathy Schechter: That's OK.

(Claire Scott): We registered for filing whatever. I don't even know because I so seldom actually get in you know to CDX. I just prepare the stuff, send it to my boss. He's the one who files. So all I really need to do is figure out what my user name is, my password and go in and add CSPP as a – as a workflow? Is that correct?

Kathy Schechter: Correct. You log in CDX. You should already have an account.

(Claire Scott): I do. I just have to (append) it.

Kathy Schechter: Exactly. If you can't remember your password then you can have your password reset.

(Claire Scott): Sure.

Kathy Schechter: Log back in and then you add a program service called CSPP.

(Claire Scott): What is the current program service called that I'm doing with the Thick Client?

Kathy Schechter: Thick Client is TSCA.

(Claire Scott): Oh, that's it?

Kathy Schechter: Yes.

(Claire Scott): OK. Second question sorry – so I don't have to keep saying returning to a follow up question, you know with the ever since we went to the e-PMN software there's been a recurring problem with the – with the Java updates. And if you update your Javas then it doesn't work with well with the software and submissions. And so every time you call the helpdesk if you've mistakenly accepted you know Java update they tell you oh, go find this old version of Java. This is what you need to put on your computer. Is that still going to be the case with this web based client?

Kathy Schechter: No, this is browser specific. It has nothing to do with Java.

(Claire Scott): Yay.

Kathy Schechter: So it's also firewall independent too. So if you can access the internet you can access CDX and the software.

(Claire Scott): OK, great. Thank you.

Operator: Once again ladies and gentlemen, in order to ask a question or make a comment please press star 1 on your telephone keypad. Your next question comes from the line of (Robin Heath).

(Robin Heath): Hello there. I was disconnected earlier.

Kathy Schechter: Yes, welcome back.

(Robin Heath): Thank you. My question related to transfer of responsibility for PMNs. In the past an overseas company that had a U.S. subsidiary, when it closed the U.S. subsidiary would – had the ability to notify the EPA to transfer responsibility for the PMN to another U.S. company. Is there any (electro link) facility for doing that?

Kathy Schechter: There was a form called note of transfer which is still available for you to download or to print and fill out – I don't remember which – which you can attach to a support document to send to the agency. It's not an electronic form per se. I think it's just a PDF or something like that that you have to fill out and attach as a support.

Anna Coutlakis: On the new chemicals website.

Kathy Schechter: We will be adding a support form to the drop down option for a notice of transfer. So besides test data, other correspondence, a withdrawal request we'll also add a notice of transfer as a document type.

(Robin Heath): OK, my second question relates to the chemical data reporting coming up. Do we have to assign ourselves primary AOs for that as another activity or can we use the same registration process?

Chris Gorder: Once you're registering for the CSPP data flow as an authorized official you'll be able to access the (CDR) reporting tool also.

(Robin Heath): Thanks.

Chris Gorder: You won't have to register separately for each submission type.

Kathy Schechter: So for example if you're a primarily authorized official for CSPP, you would click on the dropdown option of the various softwares that you can select from and that includes (CDR), e-PMN and the e-reporting the eight day FYI. Any of those software programs can be accessible through CSPP.

(Robin Heath): Thanks a lot.

Operator: Your next question comes from the line of (Christine Paulson).

(Christine Paulson): Hello, can you hear me?

Kathy Schechter: Yes we can.

(Christine Paulson): OK. Before you mentioned that some people are going to continue to use the Thick Client and to prepare the PMN and then use the Thin Client to submit it. Does that mean that the file type or you know from the old software, a file from the old software into the new program?

Kathy Schechter: Well, we'll be discussing in two weeks but yes you can.

(Christine Paulson): OK.

Kathy Schechter: It's not 100 percent meaning that what you fill in will populate to the best of its ability into to the new software but it does not transfer attachments.

(Christine Paulson): OK.

Kathy Schechter: So you'll have to re-upload the attachments one at a time and you have to redo the validation in the new software to make sure everything is populated (inaudible).

(Christine Paulson): OK. And it would be the same for someone using the light version, the TSCA light version? OK.

Kathy Schechter: If you use the light or the full client version they create the same document.

(Christine Paulson): Yes.

Kathy Schechter: Only the PMN form that you can transfer the data to.

(Christine Paulson): OK.

Anna Coutlakis: And there'll be a scheme available.

Kathy Schechter: Yes, there's a scheme available or there's the import option available for the PMN form. Yes.

(Christine Paulson): OK. And so but if you don't want to use this option – it's because I have my chemist send me the file from the eTSCA light. So if I don't have to do that I will have – they will have to get access to CDX, right register with CDX?

Kathy Schechter: Correct. But as (Sue) mentioned, the client is not going to be supported after it. So if anything goes wrong if your computer gets corrupt or you know something you may not be able to use it after that.

(Sue): Or Java upgrades.

Kathy Schechter: Or Java updates ...

(Sue): The same issue that people are having now is the updates and they tell you to find the smallest change with Java and update it. We are no longer be providing any sort of support in that.

Kathy Schechter: So don't rely on it.

(Christine Paulson): OK, thank you.

(Sue): No problem.

Kathy Schechter: We're going to newer better technology.

Operator: Once again to ask a question or make a comment, please press star 1. Your next question comes from the line of (Cynthia Lamas).

(Cynthia Lamas): Yes, good afternoon. I just wanted to make sure that I understood what has been said so far. I understood that we can have several primary authorized submitter within a company with the same address, correct?

Kathy Schechter: Correct.

(Cynthia Lamas): And we probably have several of them now in different, different segments of the company. Are all these primary AOs going to be able to access everything or it will depend on the access that for example I will provide to the other AOs?

Kathy Schechter: For a particular organization name, anybody who's an authorized official for that organization name will have access to the documents.

(Sue): They can see ...

Chris Gorder: They'll see them but ...

(Sue): That's what I said about access; not open but have access.

Chris Gorder: They cannot view what's inside the documentation or the packages unless they have the pass phrase.

(Cynthia Lamas): OK. So they cannot view it ...

Kathy Schechter: Correct.

(Cynthia Lamas): Unless I give them the pass phrase?

Chris Gorder: They'll see a list of what's been created and that's as far as they will be able to go.

(Cynthia Lamas): Oh, OK. All right, that's good. Thank you. OK and the pass phrase is there – what's the criteria for it or what's the rule for the pass phrase?

Kathy Schechter: 20 character alphanumeric for the most part. No ...

Casey Yeh: (Inaudible) characters not allowed.

(Sue): Yes, (inaudible) 20 so you don't have access, yes.

Anna Coutlakis: Eight to 20.

(Sue): Right. We'll go over that in a couple of weeks.

(Cynthia Lamas): OK, all right.

Chris Gorder: Remember it can't be reset it. So if you forget it you can no longer access that submission.

(Cynthia Lamas): So we better record it huh?

Kathy Schechter: Yes.

(Cynthia Lamas): And then – and then the information on the old program, you know cannot be – will not be completely transferred to the new one.

Kathy Schechter: The Thick Client's information will not be transferred to the new one.

(Cynthia Lamas): OK. Well that's good that you got rid of it because honestly it was very problematic with all this Java versions.

Kathy Schechter: Correct.

(Cynthia Lamas): And I you know.

(Sue): So with the Thick Client hopefully you're downloading copy of record and storing your files locally. I always encourage that with this some new software as well, anything that you create download the copy of record so that you can organize your files outside of the cloud.

(Cynthia Lamas): And for the new client we can still use our old passport – password that we used in the other client?

Kathy Schechter: If you have your CDX account to download the software it's the same CDX ID and password.

(Cynthia Lamas): OK. OK thanks.

Operator: Your next question comes from the line of (Regina Nayor).

(Regina Nayor): Hello, can you hear me?

Kathy Schechter: Yes we can.

(Regina Nayor): Hi. I understand that you can have more than one primary authorized official. I was wondering about the legally responsible part. Would that just be the AO who submitted the notice or would it be both of you?

(Sue): That's correct. When the EPA receives the document the person who is listed under for example for the PMN form section (1a) that would be the person who pushed the button of the original notice.

(Regina Nayor): Right because

(Sue): To EPA they would be the certifying official.

(Regina Nayor): Right and ...

Anna Coutlakis: And that's the only one that has the responsibility. You can have five AOs but the person who hits the button is the person for that notice.

(Regina Nayor): Right. And also like I work in the U.K. and there's these two companies in America. Would I have to submit some sort of identification as well to become an AO?

Kathy Schechter: If you have the same organization name.

(Regina Nayor): It's not really the name it's like a subsidiary.

Kathy Schechter: If it's different then you should be probably a agent or consultant.

(Regina Nayor): All right, under the company name of the U.K.?

Kathy Schechter: You would give your own company name, correct.

(Regina Nayor): So that would be as an agency so that's not an AO? Is that (inaudible) there.

Kathy Schechter: A consultant working for a U.S. company (inaudible).

(Regina Nayor): Right.

Kathy Schechter: Yes.

(Regina Nayor): OK. Yes that's – yes that's clear. I just wanted to check.

Kathy Schechter: That's OK.

(Regina Nayor): OK, thank you.

Operator: Your next question is a follow up from (Christine Paulson).

(Christine Paulson): Hello. I just wanted to – I know you mentioned that this recording would be available online. Do you know when?

Chris Gorder: It usually takes several days to get the recording to us and then another of couple of days to get everything posted. I would ...

(Christine Paulson): OK.

Chris Gorder: I would give us a week or so.

(Sue): At least a week.

(Christine Paulson): Is it – is it going to be posted on that same page with the links to the webinar is now?

Kathy Schechter: Correct. It might move to the bottom of the page though.

(Christine Paulson): OK, thank you.

Kathy Schechter: It will be on the same page, yes.

(Christine Paulson): Yes, thanks.

Operator: Once again to ask a question or make a comment, please press star 1. Your next question comes from the line of (Judith Vanostrand).

(Judith Vanostrand): Hello. I understand that each notice will have its own pass code and that you cannot reset the pass code. If you have the pass code can you change it?

(Sue): No. Once you've created the document and you've created the pass phrase it cannot be changed. You can delete the document and recreate a new one but you cannot change an existing one.

(Judith Vanostrand): OK, thank you.

Operator: Your next question comes from the line of (Elizabeth Becker).

(Elizabeth Becker): Yes, I noticed some people are consultants who are asking the question and I know for sure I will be an agent and consultant right now. And I'm just a little bit of repetition, she mentioned the pass phrase so I have been the one creating the form so I would create the pass phrase at that time?

Kathy Schechter: Correct.

(Elizabeth Becker): So I would need – I would need to understand each company's way of organizing the pass phrases.

Kathy Schechter: Correct.

(Elizabeth Becker): Or else do that for them.

Kathy Schechter: Yes.

(Elizabeth Becker): We have successfully someone I think to submit his PMN under the Thick Client today. So I'm going to find out for sure if he is going to be submitting more next year and try to prepare him for that as well. Appreciate this seminar. Thank you very much.

Kathy Schechter: Sure.

Anna Coutlakis: What is it he submitted, the Thick Client?

Kathy Schechter: Yes.

(Elizabeth Becker): He submitted a PMN through Thick Client today if I'm not mistaken.

Anna Coutlakis: OK.

(Elizabeth Becker): We haven't received it. So in technical context we'll get questions back. I want to make sure that I have the same facility now actually and preparing the – and this is a follow up – and preparing the PMN he actually had someone working for another organization, for a government organization research organization who as well as I was filling in parts of the PMN form. So that person would also be an agent ...

Kathy Schechter: Or (inaudible) I would put him in as a support.

(Elizabeth Becker): Support?

Kathy Schechter: Yes.

(Elizabeth Becker): But I can't put him in a support.

Kathy Schechter: Correct.

(Elizabeth Becker): He would have to be put in a support by OK by the ...

Kathy Schechter: Primary authorized official?

(Elizabeth Becker): OK. I will – I will make that clear as they do another one of these I'll make that clear to these folks while they're well under the system right now the Thick Client.

Kathy Schechter: And I think we'll go over that two weeks on how to assign a document to a particular agent consultant or a support registrant.

(Elizabeth Becker): OK, because what happens is most consultants know that some of our certified submitters don't do much with the form.

Kathy Schechter: Right.

(Elizabeth Becker): But this guy has been pretty active with it so he's the exception to the rule. OK, I'll be definitely on all your seminars.

Kathy Schechter: OK.

(Elizabeth Becker): Thank you.

Kathy Schechter: Glad to have you on board.

(Elizabeth Becker): Great.

Operator: Your next question comes from the line of (Amanda Price).

(Amanda Price): Hi, I had two questions. One, if somebody's registered as a primary authorized official if they registered for the (CDR), are they already registered for the CSPP flow or do they need to go under any additional registration steps in order to access this TSCA thin software?

Kathy Schechter: If they registered for the (CDR) say a while ago, they might need to deactivate their account and reactivate if they want to do an agent consultant.

(Sue): Yes.

Chris Gorder: If they're doing an agent consultant.

Kathy Schechter: If they want to put an agent and consultant. There's an option like Casey was saying on the my CDX screen to appoint an agent and consultant. If they don't have that option, then they may have to close that account and redo a primary authorized official account and then that authorized – the agent and consultant option will be there. Otherwise they don't need to change anything.

(Amanda Price): OK. My second question was, will the current light version of software still be available after January 19th of next year. I'm just concerned that you know over the years a lot of companies have created a lot of eTSCA files under the old software. Will (it that) still have the ability to read those files?

Kathy Schechter: Yes, we do the light version and the Thick Client version that's the one with encryption they both produce the same form, the same document. So either one would be able to upload into the new e-PMN. And I'm not sure how long we're going to keep the light version available. Like (Sue) said we aren't going to be updating or upgrading that software so it might be there but after a while it may not function so we might end up taking it down if everybody ...

(Amanda Price): OK. So if you want to be able to read old forms after January 19th they'll probably have to be uploaded into this new soft – new web based software?

Kathy Schechter: Anything that was created in the old system I would definitely reload it into the new software, yes.

Anna Coutlakis: Just to read it?

Kathy Schechter: Well no you should be able to – well it all depends. If you just want to read it you know you can probably still use it. If it doesn't work in which case then (as well). But you still will be able to upload it even if you couldn't read it you could still upload it into the new software but only the PMN form.

(Amanda Price): OK.

Kathy Schechter: The other forms do not upload. Those are very small forms.

(Amanda Price): OK. Thank you very much.

Operator: Your next question comes from the line of (Hiromi Greco).

(Hiromi Greco): Hi, how are you?

Kathy Schechter: I'm doing good.

(Hiromi Greco): good, good. OK, my question pertains to the eTSCA form. I know you'll probably cover more next session. But will I be able to access to the new eTSCA form right now so that I can take a look at it before then or?

Chris Gorder: Yes. So Thin Client tool is available under the CSPP data flow.

(Hiromi Greco): OK Thin Client base, OK. So I have to go look for the download link.

Kathy Schechter: Well this is the new e-PMN. This is the new CDX web based version of the software.

(Hiromi Greco): Right, the new one.

Kathy Schechter: The new one. It is available.

Chris Gorder: Yes, there's no downloading. It's just it's accessible through the CDX. Once you click on the user role like authorized official you'll go to the CSPP homepage and get a dropdown list of the available electronic reporting tools and it's under TSCA section five. You click on that and it will take you to the home screen.

(Hiromi Greco): Oh I see. OK. Thank you.

Kathy Schechter: Yes, no download necessary. Yes.

Operator: Your next question is a follow up from (Dan Dare).

(Dan Dare): Hi again. I don't mean to derail the conversation. Let me give just a touch of background before I ask my question. I'm in a position where we the company I work for we're not manufacturing anything yet, we haven't actually submitted any paperwork yet. I'm learning about this stuff as much as I can because we're going to be have to be submitting paperwork soon.

But based on this last two hours of time I think I might need a consultant and it sounds like there are consultants on the line. Is there a way I can get a list of attendees and potential people I could talk to about that?

Kathy Schechter: Hell no, not really. EPA cannot give you reference to any person unfortunately that's ...

Anna Coutlakis: Tell them who you are and your address. Maybe they'll come to you.

Kathy Schechter: Exactly. Tell them (what) point ...

(Dan Dare): All right. I will put my – I will put my email address in the chat box. Is that OK with EPA?

Chris Gorder: Can't stop you.

(Dan Dare): OK.

Operator: Your next question comes from the line of (Carol Sunman). (Carol), your line is open.

(Carol Sunman): Oh sorry, I was on mute. I know that our company can have several authorized or primary authorized officials. I just want to make sure that each one of those primary authorized officials can amend the other authorized official's submissions. Is that correct?

Kathy Schechter: As long as they have the pass phrase to open the document yes.

(Carol Sunman): OK.

Kathy Schechter: They will have the ability to see the documents and then with the pass phrase they can open the document.

Anna Coutlakis: And do whatever they want.

Kathy Schechter: And do whatever they want, yes.

(Carol Sunman): And how will that apply retroactively? So I understand going forward what we need to do. I'm just do we wait until one pops up for the older ones?

Kathy Schechter: Well, for the Thick Clients – yes the older ones are going to stay in the old system. They are not going to be transferred. So that means that it's almost starting from new with this new electronic system.

Anna Coutlakis: Can I ask you something Kathy?

Kathy Schechter: Sure.

Anna Coutlakis: Can they amend old PMNs?

Kathy Schechter: The software has the ability to amend submissions that were created in the new e-PMN by unlocking, making changes and submitting. For anything that was submitted using a Thick Client you would have to use a support for to amend that document. But that's going to be going over next week so it's a preview.

(Carol Sunman): OK, thanks.

Operator: Your next question is a follow up from (Elizabeth Becker).

(Elizabeth Becker): Yes, so thank you. Maybe this is an OK place to ask this question or an OK time. I also have been consultant agent designated to support CDX and – the (CDR) I mean. So under (CDR), I will have experience being a support person for that but there is a new authorized official coming in. Will he have to come in first and then authorize me to be his support for me to maintain my support.

Kathy Schechter: Well (CDR) is different than e-PMN with regards to the user role.

(Elizabeth Becker): OK.

Chris Gorder: If you (linked that) you won't lose your obviously lose your CDX account but you will need to request to be a support to that new authorized official.

(Elizabeth Becker): OK, so I'll have to get him newly authorized official and then he will let me be support?

Kathy Schechter: Correct.

(Elizabeth Becker): And will we – how will we access all the information that was put in by the primary support person last time?

Chris Gorder: If the new authorized official comes in under the exact company they will have access to the form as one (inaudible). They'll still be able to open it or download the copy of record and see the PDF.

(Elizabeth Becker): Yes, we won't be in that position. The company is going to change names before that. It will change names sometime this year. Just name change not purchase fold just the name.

Kathy Schechter: Yes. Then they would have to go under their old company name.

Chris Gorder: Yes, you'd still ...

Kathy Schechter: To access it.

Chris Gorder: Yes, you could have – you could either have someone register under the old company as the authorized official which would give them access to the – to the documents or you would have to submit a request to EPA asking for a copy.

(Elizabeth Becker): OK. And then also obviously we will verify all this with EPA again so that they can tell that we're a company that has been submitting (CDRs) before when the time comes.

Chris Gorder: Yes, you would have to send the request on like company letterheads.

(Elizabeth Becker): OK, thank you.

Operator: Your next question is a follow up from (Ron Alton).

(Ron Alton): Hello again. I have a couple of questions. And I'm going to say I got dropped off this thing for a couple of minutes and if I'm asking something that was discussed I apologize. Most – I'm a consultant as you know. Most of my clients tend to be smaller companies or foreign companies who very

occasionally file PMNs. So there's a lot of transaction cost of just getting them up to speed and managing their relationships with these systems.

But I'm – it occurs to me based on what you've been saying that, it's likely – it's likely that some of those companies did not download copies of record. The only time they see that invitation is when they get the little notice bounce back email saying you know it was successful, to get a downloads here's what you do. I gather what I probably ought to do if all that's going to become inaccessible before long is, go and notify all of them to go backwards in time for the past several years and try to download all the PMNs we've done together of those records.

Kathy Schechter: It might be tricky to go back that far. People change computers, their encryption key might get lost.

(Ron Alton): Yes.

Kathy Schechter: It might not be easy to go back in time. But there's the ...

(Ron Alton): That's why I ...

Kathy Schechter: Finalized file that's stored also that you can keep for your records.

(Ron Alton): Yes. OK. And my next question which I suspect you may have discussed is about this transition. We're now – we're now transitioning. We've got three more months or so with the old system and then that's it ceases to operate. A PMN project in – a PMN under developed right now with the old system that might not get finished by January, is it the case that we also stop what we're doing and basically start over with the new file and enter and just enter everything and catch that new file up and go forward with the new system?

Kathy Schechter: I would. And like I said, we have the import option that we'll go over in two weeks.

(Ron Alton): OK.

Kathy Schechter: That we what you've done so far can be imported in so.

(Ron Alton): OK, well that's the key right there. OK. I think that's it for the moment.
Thank you.

Kathy Schechter: It's not going to hurt.

(Ron Alton): Well ...

Kathy Schechter: It's just the possibility that you know if you finish early, submit it using the new system.

(Ron Alton): Well for those of you who have to figure (these) wants the imagine having to explain it every couple of weeks to a new company who's you've never heard of before.

Kathy Schechter: You have to do that with a Thick Client so it's not much different so.

(Ron Alton): Yes, yes. And you know how much I like that.

Kathy Schechter: Yes.

(Ron Alton): Got to figure out a way to get paid for that service. All right, thank you very much.

Kathy Schechter: All right.

(Ron Alton): Bye, bye.

Operator: Your next question is a follow up from (Claire Scott).

(Claire Scott): Hi, me again. So in listening to everybody's comments and everything it's finally striking me this is – this is going to reside in the cloud. Not that you haven't said that. So when I submit something now or when my boss submits something now PMN and it goes to CDX it is not in the cloud. Is that correct?

Kathy Schechter: It is stored on an EPA server.

(Claire Scott): OK. But this software is going to reside in the cloud. And so as we're working on things you know as I'm developing you know a file, I won't get it all done in one day. It's going to reside in the cloud, correct?

Kathy Schechter: Well in the cloud means it's going to be stored on some server, yes it's encrypted.

(Claire Scott): OK.

Kathy Schechter: Access through the cloud I guess you can say.

(Claire Scott): After it is – after it's submitted and finalized and submitted, is it residing on the same server on which I'm working on it?

Kathy Schechter: When you work on it it's in one location, when you submit it it transmits information to EPA's backend servers.

(Claire Scott): OK.

Chris Gorder: Well, so when you log – when you log in to CDX and you access the section five tool using through CDX, what you're doing is you're actually accessing the CDX environment and you're working within the CDX environment not your own servers. By creating that pass phrase you're creating the encryption key for your submission while it's on the CDX servers. And what ends up happening is after you're done completing submission it stays encrypted until it gets passed to EPA systems where it becomes unencrypted.

So it's not actually on your servers. Everything you're creating using the Thick Client tool is sitting in a – in a – in a I don't know a virtual desktop I guess within CDX.

(Claire Scott): Yes. Well I mean I take right now I take the you know I open the software, I open the file from my hard drive, right?

Kathy Schechter: Correct.

(Claire Scott): And so that file is sitting on my hard drive before it's finished.

Kathy Schechter: Correct.

(Claire Scott): So if it takes me weeks to finish the file it's not sitting on someone's server. I guess I'm just starting to anticipate questions from my boss who is not sitting here listening to this about (CBI) and about confidentiality and security. Not that we can do much about it, this is the way it's going to be but how do I answer his questions on you know well, are files secure?

Kathy Schechter: Yes, so I think one of the – one of the areas of discussion that we're going to do with the next two webinars when we go over the actual form will be around security. But that pass phrase that you create is a way of you encrypting that form that you're working on. So while you're able to go in there and let's say you know the span of three weeks that it takes you to complete one of these – one of these forms that you're doing, no one else can see what you're doing except for anyone else that you've given that pass phrase to.

(Claire Scott): OK.

Kathy Schechter: So you they can't see anything that's in progress for you.

(Sue): Help desk cannot view ...

Kathy Schechter: The helpdesk cannot see anything. No one can view that pass phrase which is why it cannot be changed or reset because no one can access that information until you submit and (it's set) behind EPA's firewall and decrypted and over into the (CDR alliance).

(Claire Scott): OK, what about hackers?

Kathy Schechter: We'll definitely go into more detail about that in the next few webinars.

(Claire Scott): Will you talk about hacking and the possibilities of you know breaches of security?

Kathy Schechter: I don't think we'll go to that level no. I don't think we'll go to that level.

(Claire Scott): OK. Well it's just a suggestion. Thank you.

Operator: There are no further questions.

Chris Gorder: (Rachel), let's give it a couple of more minutes just in case we have a last minute question please.

Operator: Certainly. As a reminder in order to ask a question or make a comment, please press star 1.

Chris Gorder: Different than mine. Yes (your land) you're (on a land). Yes that can be (inaudible) anything ...

Operator: We do have a question from (David Peezler).

(David Peezler): Good afternoon. When are you going to have the tab set up so that we can set up agent consultant.

Kathy Schechter: The tab is there. But if you have registered before the tab became available, then you may have to deactivate that user role and then reactivate it in order for the tab to appear.

(David Peezler): OK, because yes I couldn't see it.

Kathy Schechter: Yes.

(David Peezler): And you didn't have anything on the slides on how to – how that process occurred. You just ...

Kathy Schechter: Under the my CDX box when you look at your user roles you'll have a status where it says active and then in parenthesis deactivate.

(David Peezler): Yes.

Kathy Schechter: Hit deactivate and then re-add a program authorized official role and create a new one.

(David Peezler): OK. All right, thank you.

Operator: Once again to ask a question or make a comment, please press star 1. Your next question comes from the line of (Catherine Zokawsky).

(Catherine Zokawsky): Hello, I have a question going back to the facility management. I'm looking at multiple facilities for certain locations and there are numbers here EPA registry numbers and program ID number. Does it matter which program ID – I mean the registry ID numbers are the facility numbers which are the same but the program ID is different. Can you just explain a little bit how those numbers work?

Kathy Schechter: Hold on one second while we – I'm trying to take it back to the screen ...

Anna Coutlakis: We're going to pull up ...

Kathy Schechter: Where you're at.

Anna Coutlakis: We're going to pull up a screen shot page where it occurs so she can explain it.

(Catherine Zokawsky): OK.

Kathy Schechter: OK, so you're saying that you have the same address but it has different, what's ...

(Catherine Zokawsky): It has – it has different so in some cases it has different EPA registry IDs and in others the EPA registry IDs are the same but the program ID is different. And there is slight difference in how the address is written for example street versus ST abbreviation. So I think this is more like management of how these facilities were entered?

Chris Gorder: Yes. I believe what the (analysis) maintained by (SRS), I believe the – I'm sorry (FRS).

(Sue): Facility register.

Kathy Schechter: Facility register.

Chris Gorder: Yes. And I believe what they do is they do a manual reconciliation when they – when they have multiple facilities that look like they're the same address like one is spelled out with street, one is ST. I believe the registry ID becomes a unique identifier for all of those facilities. So you're not going to see the

EPA registry ID that's common for multiple lines where there's only minor differences. But ...

(Catherine Zokawsky): OK and ...

Chris Gorder: I'm not sure what the registry EPA registry ID is.

Kathy Schechter: The program ID. Yes.

(Catherine Zokawsky): Yes, program ID it says something like TSCA and a number or just a number. So I'm not sure if it's for the different – like for example one was the submission for (CDR) and another for something else. I'm not sure.

Chris Gorder: It might have been something that they've registered under a certain data flow or something and that's just an internal identifier that they had.

(Catherine Zokawsky): OK, so when selecting facilities for PMN submission, EPA registry ID is your most preferred number to maintain the same.

Chris Gorder: Yes. Correct.

(Catherine Zokawsky): OK. Thank you for the – for the answer.

Kathy Schechter: Sure. Thank you for being in the facilities. I haven't been into it that much so I'm not sure about how the data is and the data quality so.

(Catherine Zokawsky): Yes. It probably needs some clean up. That's what I'm looking at. Thank you.

Operator: Your next question is a follow up from (Cynthia Lamas).

(Cynthia Lamas): Yes, just I wanted to say that there were some a lot of pages missing from the presentation. Could that be ...

Kathy Schechter: Yes, we will re-upload the newer version. I didn't realize that there was a second version when we uploaded it on the website. So it will be uploaded along with the verbal.

(Cynthia Lamas): OK. Thank you.

Chris Gorder: Audio file.

Kathy Schechter: Thank you, audio file.

Operator: Your next question comes from the line of (Richard Happler).

(Richard Happler): Hi there.

Kathy Schechter: Hey (Rick).

(Richard Happler): A couple of questions. Of course we have a lot of as we say with the Thick Client all the TSCA forms are stored on the hard drive finalized in drafts. When the new software comes into effect or we use that can they read the old TSCA forms or ...

Kathy Schechter: The PMN file can be uploaded but ...

(Richard Happler): OK it's uploaded in the new systems.

Kathy Schechter: You still have to use – yes. You have to still the eTSCA software to open the eTSCA file. However, the finalized file should have PDFs inside of them the form data.PDF that would be the PMN form or whatever form that you created.

(Richard Happler): Well yes, I always create – I always create a PDF from the finalized version. But of course the version when you create a PDF none of the attachments come along and you have to go back and back add (them). Will that change in the new system?

Kathy Schechter: Well the finalized files are – and we can go over this in two weeks – are technically zipped folders. So we can anybody who still has an eTSCA file can open it with WinZip to see its guts so to speak. That would mean all the attachments and the forms.

(Richard Happler): Yes.

Kathy Schechter: Both the (sanitized) and the (DBI) version for a finalized file.

(Richard Happler):OK.

Kathy Schechter: So you're not losing any of your data by keeping the finalized file.

(Richard Happler):OK.

Kathy Schechter: And if you can't use the software to open it then you can open it with WinZip and see the contents.

(Richard Happler):Ah, all right. That's why I always have always been making a PDF version and then back adding all the attachments so I can circulate that or archive that for anybody who needs to look at it ...

Kathy Schechter: Yes.

(Richard Happler):Who didn't necessarily have filed.

Kathy Schechter: But we'll cover that again next time too so you can visually see what we're talking about.

(Richard Happler):OK.

Kathy Schechter: Good.

(Richard Happler):And so just a follow on to that one, in the new software when I go to make it print will that include the attachments or not for the PDF?

Kathy Schechter: It will be just like you have now.

(Richard Happler):OK.

Kathy Schechter: When you hit print it'll print the PDF of the form ...

(Richard Happler):But not the – not the attachment?

Kathy Schechter: You have to go to the attachments you'd have to go to each attachment. We have a screen where you can click on it and it'll open the attachments so.

(Richard Happler):Yes, yes, yes. You can back – you can back add those with Acrobat.

Kathy Schechter: Yes.

(Richard Happler): Yes. OK, thank you.

Operator: Your next question comes from the line of (Jennifer Green).

(Jennifer Green): Hello.

Kathy Schechter: Hello.

(Jennifer Green): Hi. My question, I'm still I'm a little bit unsure about these roles. So the way that we do it in my company at the moment is we're like two separate companies. Like I'm based on Norway and I've been preparing all the documentation, and then like I send that all over to we have like a sister company in the U.S. and our guy out there does all the submissions. But I'm a bit unsure about like which roles both of us will be taking.

I kind of understand that the guy in our sister company in the U.S. will take the primary authorization role but I'm not quite sure which one – which one I'll be doing if I'll have access to the to all the submissions to be able to create submissions.

Kathy Schechter: I usually go back to referring to the company or the organization name because there are a lot of European companies that have the same name as the U.S. company. So I – and it might be up to the U.S. company how they want you to be represented. So I would talk it over with them to see if they're OK with you being authorized officials if you have the same company name. or they might want you to be registered as agents consultants.

So you have some limitations but you still have quite a bit of abilities that an authorized official would have.

Anna Coutlakis: They can't submit. They could maybe become AOs for the submitting their company name.

Kathy Schechter: If they have the same company name.

Anna Coutlakis: They don't have a U.S. address to submit.

Kathy Schechter: Correct.

(Jennifer Green): Yes we don't have a – yes we don't, yes. I'm kind of still confused like because I thought I because I don't – because we don't have a U.S. address.

Kathy Schechter: Yes.

(Jennifer Green): It's like we have a there's a slightly different company name. Like the name in the company name in Norway and the company name in the U.S. it's slightly different.

Kathy Schechter: Then I would suggest you be agents and consultants because they will technically be the ones that will be submitting the primary authorized official to submit to the agency because they have the U.S. address. So I would make you guys the ones who are not in the U.S. and do not have the same company name the agents and consultants to that company.

(Jennifer Green): OK. And that does that mean I can create – I can create documents?

Kathy Schechter: You can do everything except submit ...

(Jennifer Green): And then I can do everything.

Kathy Schechter: Everything. That means (inaudible) (delete) what can be deleted ...

Anna Coutlakis: Amend.

Kathy Schechter: Amend et cetera. Download a copy of ...

(Jennifer Green): So can I – OK. So can I do it because I mean I have already have a CDX profile. So like do I just go through? Can I just assign myself then as a (just) like a (inaudible) highway agent?

Kathy Schechter: Yes the agent (inaudible) they have to be sponsored which means as Casey said it's a closed process. So that means you cannot initiate it. The authorized official has to initiate it. They would invite you ...

(Jennifer Green): OK.

Kathy Schechter: To be an agent and consultant and then you would say yes, I would like to be an agent and consultant. And then they would approve you and then you'd be in. By ...

(Jennifer Green): OK so like what – sorry.

Kathy Schechter: By invitation only.

(Jennifer Green): OK. So what do I do I already have like a CDX profile? So what like what happens with that?

Kathy Schechter: Nothing. That's great. You would still use your profile as your CDX account. You would just have them initiate the process to add you as an agent and consultant role. And then once you get approved it will be under your CDX account.

(Jennifer Green): OK, good. OK, thanks very much. That is much clearer now. Thanks, thanks for all the information tonight too. Thanks.

Operator: Your next question comes from the line of (Amanda Price).

(Amanda Price): Hello, I had a follow up question to my question on the issue of people who are already authorized officials for (CDR). You mentioned they may have to deactivate and reactivate their – or deactivate their registration. If they do that are they going to lose access to all the (CDR) forms that they submitted earlier?

Kathy Schechter: No. The account will still be the same account. So are you – so are you planning on remaining an authorized official in both (CDR) and the new section five?

(Amanda Price): Well I have a few clients who are in the situation of they are already registered as a primary authorized official for (CDR). And now they have question on how they can now get access to this new TSCA software. So I'm trying to figure out what exactly I should be telling them, and I just want to

make sure that they don't lose any of the information that they submitted earlier. So that can be important for their future records.

Kathy Schechter: No they won't. And as long as they are remaining as a primary authorized official and they're using section five you shouldn't have – they shouldn't have to deactivate it and reactivate it. What they can do right now is they would be able to right now actually go in there log into CDX, go and pretend as if they were accessing (CDR). And in that dropdown that they see where (CDR) is, open up that dropdown and section five should be available for them.

(Amanda Price): OK.

(Sue): The only reason why we're talking about the deactivating and reactivating is if the authorized official wanted to appoint an agent or a consultant.

(Amanda Price): OK.

(Sue): They may not have tab options.

Anna Coutlakis: Or they want to come in as an agent consultant?

(Sue): No, no, no nothing to do with them being an agent. It's if they want to appoint an agent or a consultant. The option may not be available on the my CDX screen.

Anna Coutlakis: Got you.

Kathy Schechter: They can still access both program services workflows.

(Amanda Price): OK. OK, thank you.

Operator: Once again to ask a question or to make a comment, please press star 1. Your next question comes from the line of (Carol Sunman).

(Carol Sunman): Hi, can I as a primary authorized official assign all like an all view to my primary agent consultant? Or do I have to do it one by one submission by submission?

Kathy Schechter: Say that again.

(Carol Sunman): If I have a person that I want to have primary authorize – sorry, primary agent consultant role ...

Kathy Schechter: Correct.

(Carol Sunman): For all of my company's submissions, can I do that in a kind of a one box check all or one invitation? Or do I have to assign to that person on a case by case basis or a submission or by submission basis. How does – how does that work?

Kathy Schechter: If they were not the originators of the document then yes, each document would have to be assigned to that agent and consultant. So each document, yes.

Anna Coutlakis: So each document is a world of its own or is it the case like a PMN number case?

Kathy Schechter: No it's the document.

Anna Coutlakis: Each document.

Kathy Schechter: Has access control.

(Carol Sunman): OK, thanks.

Kathy Schechter: So it all depends on what that person would need access to and then the authorized official would then give them the access.

(Carol Sunman): Sorry, so one last question. I guess I'm maybe I'm confusing agent consultants with third parties and the technical contacts. So you probably said it earlier but the technical contact can still submit and amend documents, correct?

Kathy Schechter: It depends on what role that technical contact plays. It could be from the submitting company and be an authorized official or they could be not from the submitting company and be an agent and consultant. And either way they would be able to submit supporting documents.

(Carol Sunman): OK.

Anna Coutlakis: And amend.

Kathy Schechter: Amend.

Anna Coutlakis: And amend.

(Carol Sunman): OK, so if the – if the technical contact is not a U.S. citizen or have a U.S. address they could be an authorized official but not the primary authorized official?

Kathy Schechter: They would most likely be an agent and consultant.

Anna Coutlakis: Do they belong to the submitting company just overseas?

(Carol Sunman): Yes.

Kathy Schechter: If they have the same submitting company organization then they could be authorized officials of that company if they wanted – if the U.S. company wanted them to be. Otherwise they can sign up as authorized officials – as agents and consultants.

(Carol Sunman): OK. OK, thanks.

Operator: Once again to ask a question or make a comment, please press star 1. There are no further questions. I'm sorry, we do have a question that just popped in from (Beth Stife).

(Beth Stife): Hello.

Kathy Schechter: Hello.

(Beth Stife): Hi. Kathy just out of curiosity, would we submit bona fide with intent to manufacture via CDX? Can we do that now or will that be on the new site?

Kathy Schechter: You can start it and do it now if you want.

(Beth Stife): Oh, OK. I'd rather do that ...

Kathy Schechter: But it becomes mandatory come January using the ...

(Beth Stife): OK. (I'll) practice on doing that now. Thank you.

Anna Coutlakis: Yes, anybody can submit all these forms now. We are waiting for you guys to submit something to ...

(Beth Stife): Oh.

Anna Coutlakis: See how the process is working.

Kathy Schechter: Yes please.

Anna Coutlakis: We've (had a).

(Beth Stife): I will do that. Thank you.

Operator: Once again to ask a question or make a comment, please press star 1. Your next question is a follow up from (Ron Alton).

(Ron Alton): Actually I'll pass. Thank you.

Chris Gorder: Oh no.

Kathy Schechter: Thanks (Ron).

Operator: Again to ask a question or make a comment, please press star 1. There are no further questions.

Chris Gorder: I see we're ...

Kathy Schechter: I think we'll be wrapping things up. Thank you for joining us on the call today. We will be posting both the audio and the video at least probably within a week or so whenever we can get them and get them posted. Please submit any other remaining questions to (e-TSCAreporting.com) and we hope to hear from you ...

Chris Gorder: @epa.gov.

Kathy Schechter: In two weeks. @epa.gov, sorry about that. Hope to see you in two weeks or hear from you anyway. Thanks a lot everyone.

Operator: Thank you ladies and gentlemen. This concludes the CDX registration walkthrough conference call. You may now disconnect.

Chris Gorder: Thank you (Rachel).

Operator: You're welcome. Have a good evening.

END