EPA

Moderator: Kathy Schechter
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Operator: This is Conference #-9387578.

Kathy Schechter: Hello, everyone. This is Kathy Schechter from the EPA. Thank you for joining us today. I'm glad that we're able to finally get everyone logged in. Today's webinar is the thick clients talk on the PMN form including joint and (similar support) and the support form …

(Off-Mic)

Kathy Schechter: .. then Client

OK. So, first I wanted to remind you that we have a series of webinars going. We had one three weeks ago with regards to the CDX registration. We just recently uploaded the slides in the presentation on to the new chemicals website. Today's talk, of course, the form, that's probably the biggest talk yet that we're going to be giving.

In two weeks. September 30th, we're going to have another webinar for the other modules within the software, that includes the notice of commencement form, the biotech form, the bona fide form and what we call the SNUR alternative control measures form. So, please tune in in a couple of weeks for that webinar and hopefully we'll hear from you.

A couple of things to remind you when we go through this webinar, please hold your questions. We will do the presentation, I think we're going to do a slide presentation and then maybe either throughout or at the end we'll do a demo, so you'll a live version of the software as well as see the slides.

Please mute your lines. We do not want to have anything in the background, so mute your lines. And I think that's it. So, what I'm going to do is let you now that from today's talk like I said, the major part of the talk is going to be on the PMN form itself, touching into the letter of support joint.

So, we're going to g through and do a little bit of background on your roles from last time. Like I said we have the webinar and slides and the audio up, so please go back and look at that if you need a refresher beyond what we're going to give you today. We're also going to go over the security with regards to storing the information on EPA servers or the "cloud."

We had some questions at CDX registration webinar that we're going to now address at this talk. And then we're going to do the slides and demos of the PMN form the, joint letter of support and the support document form. And lastly, we're going to go over a few just clicks of website links for resources and then at the end a question and answer session.

So, just to give you a little bit of a background again on the registration (EPAS for) client for which e currently use and what we have had in place since 2010 had two roles associated with it, an authorized official role and a support registrant role. This has now been expanded because it's now going to be a secured session in the "cloud" and so, we've expanded our roles to include other – a secondary role type for joint letter of support and we've also (added agent and control control) so that persons not of the submitting company have the ability to do just about everything that a (primary) authorized official can do except for submit the original notices.

So with that, I'm going to hand it off to (Kacie) who's going to go over the PMN, how to get into the PMN and how to start PMN.

(Kacie Howard): Thank you, Dr. Schechter.

So, first we'll discuss the a little of the security features related to the section 5 Thin Client. The Thin Client is a browser-based application and in addition to that periodic scans are performed to test the strength and include new (house) methods to test for (as already) identified by security professionals and to verify compliance to strict security standards.

The submission of PMN data is facilitated via EPA CDX which allows companies to electronically submit data and provide security exchange of CBI data. Security is also improved using digital encryption. All data is encrypted (in transit) to federal standards. Sensitive data is encrypted at rest to federal standards. And all sensitive data remains encrypted at rest until it is behind (OCSGP) firewall.

So, in addition to the CDX log in, a safeguard for CBI data is the (passphrase) functionality which limits exposure of submission data to those who know the (passphrase) for each form. And in addition seeing it has (PDF) are generated for any information (marked as CBI in their) PMN form. So, CDX supports the following browsers including Internet Explorer 8 or above, Mozilla Firefox 2.0 or above, Safari, Google Chrome and Opera.

So next we'll cover some features of the section 5 Thin Client compared to the (inaudible) client.

The section 5 Thin Client allows for multisession web forms which means that instead of saving a file on the computer, a form is now accessible online and can be accessed from any computer with an Internet connection and completed. And another benefit is file integrity, since the Thin Client eliminates the need to store files on individual computers which was the main cause of file corruption.

In addition, a browser based form allows the user to bypass the firewall issues that have been encountered by the thick client. And then the Thin Client also allows the user to upload XML files into a PMN form. And there are a lot of users to upload forms of multiple chemicals and for companies with their own data collection systems to upload data.

So, another feature to highlight is that there's no (inaudible) limitation associated with the section 5 Thin Client. And in addition, there are no Java constraints within the Thin Client. The Java version installed on your computer has no effect on the Thin Client usability.

So, next there is integrated validation of chemicals between the Thin Client and substance registry services and this integration allows user the ability to pull chemical information from SRS for by-products, impurities, monitor (inaudible).

So another advantage of the Thin Client is in-form amendments and this means that rather than utilizing a separate amendment process for new submissions, amendments can be completed by unlocking, amending and submitting a form.

In addition, the Thin Client now generates a copy of record and the copy of record appears as one of the indicators that EPA has received the submission and serves as a record of submission.

Next, the section 5 Thin Client offers the ability for joint submissions to be completed separately and independently using designated roles.

Kathy Schechter: (OK).

(Kacie Howard): So, in addition, CDX and SRS integration allows for facility information to be pulled from the CDX registration profile. (For) facility information is identified in sync with SRS which includes duplicate checks and registry IDs that are generated and received in real time. So then the user has the ability to identify facilities within a PMN form for site control by submitter and site control by others.

And then another advantage is the addition of the new user rules which offer greater flexibility and security. And lastly, multi (AO) functionality allows users within your organization to view the forms that have been created by other users within the same organization and potentially share access to forms.

Kathy Schechter: OK. I want to make a brief comment here. It seems like people might be getting disconnected on the phone line, so I just wanted to let the operator know, please check to make sure that everything is working sufficiently. Thank you.

Operator: Yes, ma'am.

Kathy Schechter: OK. OK.

(Kacie Howard): Then another feature of the Thin Client is the ability to copy CDX registration data and this functionality is available on the technical contact page and the agent information page which allows the user to pull in, you know, the logged in user's CDX registration information into a form. And then in addition, contact information of the user that submits the form automatically populates within the submitter information fields during the submission process.

So next, we'll review some pointers regarding some of the processes within the new section 5 Thin Client.

When uploading documents, a document type and subtype value is required. And these values help categorize and classify a document. You should also note that if the required fields within the attached document window are not populated, the document is temporarily removed and has to be reattached after populating all required fields. You also have the ability to upload CBI and standardized documents simultaneously. All documents uploaded with the form can be viewed on the attachment summary page.

But note that (thin) (inaudible) files are not shown in the attachment summary page and in addition, if you want to view or move a document, this has to be done at the original upload location within the form, not the attachment summary page.

So next, we'll review the differences between multi-component submissions versus consolidated submissions. So a multi-component submission is a submission where two or more substances are submitted within a single form where the following traits are applicable.

Substances are made in one pot, that is they will be identified within a single chemical folder and the application. Substances are always made together and are not separated or isolated as individual substances, and there is no intent to create any of the chemical (sub dually). In addition, prior approval from the pre-notice coordinator is not needed. A single user fee applies for the chemical mixture. A single case number will generate and be assigned to the mixture.

The review outcome given is for the mixture not for each individual chemical substance and one not form is submitted for the chemical mixture. A consolidated submission is a submission that contains two to six chemical substances.

A consolidated submission does require prior approval from EPA before filing the PMN. A user has to contact the (pre-notice) coordinator. Substances are not usually made in one pot. That is within the Thin Client application each substance is identified within its own chemical folder.

A single user fee applies to the chemical mixtures, that sequential case numbers are assigned for each substance within a submission. A separate review outcome is provided for each substance but (inaudible) form is needed for each substance.

Kathy Schechter: There is one more thing that I forgot to add to this slide as well for a consolidated submission, each chemical needs to be, have the chemical identity gone through inventory expert services. In other words, it has to be method one. For a multi-component submission, you do not need to use, (inaudible) inventory expert services. It's not required.

(Kacie Howard): Great. So next, we'll cover how to assign forms to support persons. When you log in from the home screen, you'll click the user management linker tab. And this takes you to the user management page.

And then you will select the form that you would like to assign to a support person from the form alias dropdown menu. And then this – and then the form information for that form displays within the form information field.

The support person or persons you are associated with will then display in unassigned field. And then you'll select the assign the form – the selected form two and then click the add link.

Kathy Schechter: So that can also be agent to consultants in that list as well as support persons.

(Kacie Howard): Yes. Then your support person displays within the assigned field, but then you have to click the save button to actually save the form assignment. And then when the support person logs in, the assigned form will now display on the section 5 notices and support form screen.

So next, we'll actually do a demo with the PMN form within the Thin Client tool.

Kathy Schechter: The webinar. Can you see it?

(Kacie Howard): I had to change the (inaudible).

Kathy Schechter: All right. Please wait a moment while we pull up the second file where we open up an Internet Explorer.

Female: (inaudible).

Kathy Schechter: All right.

(Kacie Howard): All right. So when you log in you'll enter your credentials into the user ID and password field. And you'll click the log in button. So then this takes you to the "My CDX" page and we'll click the primary authorized official roll link for the CSPP program service.

And this takes you to the chemical information submission system. And you'll select your – the application from the dropdown menu, select TSCA Section 5 Notices and Supports e-PMN. And then click the OK button.

On the home screen, you'll click the forms tab or link. So on the section 5 notices and supports forms page, you have some instructional text regarding, you know, the elements on this page. You have this kind of question mark icon where you can access help information and then you have this forms table.

So you have an alias column where, you know, the form alias that a user enters is displayed. You have this type column header where the form type displays and then you have this subtype column header where the form subtype displays.

Kathy Schechter: (inaudible).

(Kacie Howard): (inaudible) is that better?

Male: (inaudible).

(Kacie Howard): Is that better?

Male: Yes.

(Kacie Howard): OK. Sorry about that. And then you have the case number column header where after you submit a form your case number that you're assigned displayed.

And you have your status column header where the status of the form displays either in progress or submitted. And you have your modified state column header where it shows the dates that a submission was last modified.

Then you have your submission date where it displays the date that the form was submitted. The copy of record column header shows the copy of record icon. And then action column header displays, you know, either a delete icon for forms that are in progress, it shows a lock icon for forms that have been submitted and it shows an (inaudible) (must) icon for forms that have been submitted and then unlocked for amendment. And then to kind of sort, you know, your forms you can click on this column header to sort your forms by ascending or descending order.

And then you can also determine like the number of forms that display on this page by selecting a value from (inaudible) page dropdown menu. There's an export option section that allows you to export the form screen in either CSC, Excel, XML or PDF format, but this only displays if you have a form in your forms table.

And then you have your form type dropdown menu. You can select the type of form you will create, so we'll just select pre-manufacture on this PMN and then click the start new form button. So this takes you to the "Create Passphrase" screen.

And then – so on the pre-passphrase screen, you'll enter in your passphrase in a (inaudible) form. So passphrase has to be at least eight characters in length. Special characters are not allowed but spaces can be included and then to better protect your form you should include both letters and numbers.

And then just remember that you – your passphrase can't be reset or retrieved so it's to remember it. We will enter in a passphrase in the new passphrase field and then the confirm your passphrase field.

Kathy Schechter: Yes. You can try to make it as easily remembered as possible, meaning that you don't want a passphrase for every form, then you have to keep track of that. And you'd have to pass it on to anybody who follows you if you leave the company.

Agents and consultants can create forms which means they have to create the passphrase, so make sure that your companies tell the agents, consultants what they want they want their passphrase to be so that they can get into the documents as well.

It is something that needs to be shared, so make it as easy to remember. Try not to make it too complex or complicated. And definitely write it down. But you didn't hear me say that.

Female: Just to add to that. Hopefully, people can hear me on the phone is that if you have multiple forms, you can use the same passphrase in those multiple forms. And yes, just to reiterate again that once that passphrase is created, it cannot be reset and no one can retrieve that passphrase for you if you forget it because it is used for security and encryption purposes.

Female: So you could use a passphrase say for a case, you could use the same passphrase (inaudible).

Female: Or for a company, for a case, yes, however you want to organize the passphrase in a way that you can remember it.

(Kacie Howard): Yes, so there's no requirement that has to be unique to each form.

Female: That's right.

(Kacie Howard): Enter (inaudible) passphrase and we'll hit the "Next" button. This takes you to the general form information page. Can you have your form alias which auto generates with your form type and a timestamp that needs to be edited as needed. That's easy to remember.

When you have your type of notice dropdown menu, you can select the type of notice that this PMN form will be. And then you can enter your toxic substances number into the (GS) number field and your payment ID number.

Kathy Schechter: Yes. The (TS) number is a six alphanumeric number that you create. You can go to the new chemicals website and it gives you instructions on how to create a good (TS) number, it's also put on to your user fee for MCANs and PMNs.

(Kacie Howard): So – and then you have test data checkboxes and you can check the checkboxes to indicate the type of test data that will be included within your form. And then below, you have some – you have a joint PMN checkbox and a letter of support checkbox, so you can indicate whether you have a joint PMN form pending and/or a letter support form pending. And you can click that button.

Kathy Schechter: One thing you have to remember, within this software is that the "Next" button is a very important button to choose. Don't use the navigator on the left hand side to go between screens because when you go to the "Next" button, it validates the information and updates things on the navigator depending upon the choices that you make on that screen.

(Kacie Howard): That's correct. So after you click the “Next” button, you know, if you selected a PMN or non-notice type then you'll see the user fee certification page. And you'll select a user fee, just select a radio your button to indicate your selection and click the “Next” button. Then it takes you to the agent information page, so you can click the "Add Agent" button to add an agent.

And then this generates the "Add Agent" pop-up window. So you have the option to, you know, copy your CDX registration information to identify yourself as the agent and then check the CBI checkbox to claim the agent information as confidential.

Enter in the agent's first name in the "First Name" field. The agent's last name is in the "Last Name" field.

Female: (inaudible).

(Kacie Howard): Yes. The (inaudible) position, the company name, the phone number, email address, the mailing address, enter a city. A state is required if you are identifying – if the country is set to United States and then enter a postal code.

We'll click the “Next” button and we'll – let me take you to the technical contact information page. Then you'll click the "Technical Contact" button which has the same field. So if you choose to copy the association information, you'll get kind of a confirmation message pop-up. Click the "OK" button. Just the main difference being (inaudible) is that your technical contact has to be from the U.S.

Then click the “Next” button. And then this takes you to the additional submission information page. In this first section, you can identify any identification numbers and (inaudible) associated with this form. You can enter a pre-notice communication number into the pre-notice communication number field and enter a previously submitted notice number, yes.

And then you can click the "Save" kind of like this icon to save your entry. You can click the "X" icon to delete your entry. You can click the kind of like green "Find" icon to add another field. Enter in a previously submitted notice number. You can enter a bona fide intent notice number.

If you check the non-checkbox, then that basically removes field and, you know, you're just saying that you don't have any pre-notice communication numbers. And you can also or you could check the CBI checkbox to indicate any of these identification numbers as confidential.

And in the bottom you have a manufacturer checkbox, an import checkbox so you can check those or either one to indicate whether you'd be manufacturing or importing these chemicals and then check, you know, other (inaudible) checkbox.

Then we'll click the “Next” button. And then this takes you to the chemical identification page. So on the chemical identification page, you'll indicate whether you're kind of identify a class (inaudible) chemical substance or a polymer. You'll select the "Radio" button. And if you have a joint submission or a letter of support that's pending, then the chemical alias field is required. And then this – whatever you're entering here will show up within in the navigation tree for your, within the navigation tree.

Kathy Schechter: Just as an FYI for class one, Class Two substances, class one substances are discrete substances designated by single structure. Class two substances are substances that are mixtures where there's at least two structures, polymers are anything that contains repeating units. So that could include (siloxanes) and silicones as long as chemicals that contain the word "polymer" or polyethylene glycol.

(Kacie Howard): We'll click the “Next” button. Then this takes you to the class one or two chemical substances page. You'll click the "Add New Chemical" button to generate a chemical field set. You can select the "Class One" or "Class Two” radio button to indicate the class of substance.

If you do select the "Class Two” radio button, then the Class Two substances screen will generate within the navigation tree. You can check the CBI checkbox to indicate the class of substance is confidential. And then here you can click the "Search SRS" button to basically search for or identify your chemical.

Kathy Schechter: Yes. We realize that you probably – you probably wouldn't find your substance in SRS, but we ask that you take a look and search for it just in case first. And then if you don't find it in SRS, then you can continue on from the screen.

(Kacie Howard): So if your chemical wasn't in SRS, you can click the "Create New Chemical" button and you can enter in your chemical information here. Basically, your – the chemical name is required.

Kathy Schechter: So if you have a chemical name with a definition, you would include both in this box.

(Kacie Howard): And after you enter in your chemical name and definition, you can click the "OK" button and your chemical information populates (inaudible) kind of display on the chemical field. And then you can check the CBI checkbox to indicate the chemical information is confidential. And then if you check the CBI checkbox, then you have to enter a generic chemical name.

So here you can select the "Method One" or "Method Two" radio button to indicate the (IE) method. If you select the "Method One Radio" button, then you have to enter an (IEF) order number or (inaudible) number. And then you can enter a molecular formula if you – if you want to. And then you can check the CBI checkbox.

Kathy Schechter: It's required. Yes, I think it's required.

(Kacie Howard): And then you can check the CBI checkbox to indicate the molecular formula is confidential. And then below you can select the (IE) from the section dropdown menu to attach any kind of supporting documentation. If you select, for example, chemical (inaudible) the "Attach Document" button, first you'll select the value from the type dropdown menu. And then browse for your file. And enter a description of the document which is required, enter in the number of pages. And if you want, you can check the CBI checkbox to claim your attachment is confidential. And then you would have to also identify the type of attachments.

And then after you populate your attached document fields, you can click the "OK" button. OK. Now you can click the "Save" button to save your entered information. So now you can click the “Next” button.

Kathy Schechter: So, for example, if you had a multi-component mixture, you would add new chemical on the screen.

(Kacie Howard): Right. You would click the "Add New Chemical" button.

Kathy Schechter: If you had a consolidated chemical, you would go to your navigator and underneath your current chemical you would select to add consolidated chemical.

(Kacie Howard): (inaudible) (chemical for now) and click the “Next” button. And then since we identified this as a Class Two substance, the Class Two substance is page displayed. So here you can search SRS to identify precursor substance. You can check the CBI checkbox to claim the precursor substance is confidential.

You can enter in nature of reaction text field and then check the CBI checkbox if you need to claim that information as confidential. You can enter the range of composition, typical composition into the range of composition text field. And then you can attach any kind of supporting documentation for a Class Two substance.

I don't know off the top of my head, but supported – the attached – the files that are supported are in the user guide so, you know, (doc) file PDF (inaudible) and then, you know, (inaudible).

Kathy Schechter: For the most parts, PDF and Microsoft Office files except for Access, so Excel and Word.

(Kacie Howard): Yes. Navigate to the next screen. And then this takes you to the additional chemical information screen. From this screen, you can click the "Search SRS" button to identify your – any chemical impurities they may result. Then you can enter the maximum percent then click the "OK" button. Then the information populates within the table and click the "Search SRS" button to identify any type of by-products that occur.

Then you can enter any chemical synonyms into the synonym field. You check the CBI checkbox to claim the (inaudible) confidential you can save or delete or add or edit, and then enter it in any (inaudible) name and save. And then you can also attach any type of supporting documentation here also regarding by-products or impurities.

Then click the "Next" button. And then this takes you to the production or safety information screen. So here you can enter in your production volume information. You can enter in your maximum first 12-month production values into this field and then enter your maximum 12-month production volume in the maximum 12-month production field. You can check the CBI checkbox, to claim if this information is confidential. But then the (binding) checkbox is only applicable for an (LBE) or (LBE) modification. And then you can attach the hazard information here and check this (binding) checkbox.

Kathy Schechter: So that would be like a safety data sheet or a label.

(Kacie Howard): So (inaudible). They could enter in – upload in the authentication and click the "Next" button when you're done. OK. So then this takes you to the use information screen. You can click the ("Add Use") button to generate use information field set.

So here you can enter in the category of use information into this text box. You can check the CBI checkbox to say the information is confidential or check the (binding) checkbox to, you know, if the information is (binding).

If you do check the CBI checkbox, then generic use description text field text box displays, enter in that information there. And then you also enter total production for this use and then percentage and formulation as part of the mixture.

Kathy Schechter: So, for example, if you have only one use, the total production for that use should be 100 percent.

(Kacie Howard): Right. But if you have like a pending letter of support or joint submission, they could provide that information. You can check the CBI checkbox to claim either of these values as confidential. And then you can enter in values for the percentage of substance expected for use (inaudible) limited, consumer use, industrial use or commercial use.

Kathy Schechter: These have to total up to 100 percent.

(Kacie Howard): Right. If you leave a field blank then we'll recognize it as zero or you can – then you can check the CBI checkbox to claim the substance expected to use information as confidential and check the (binding) checkbox to claim the information is (binding). And then if you did provide some type of consumer use, then you can provide additional details in the consumer use text box.

Kathy Schechter: Please look at the help instruction on what information is needed for consumer use. We need a very detailed explanation of what products, what percentages, what (inaudible) exposures. All of that information is required.

(Kacie Howard): And then you can attach any supporting documentation, any information documentation you may have and then click the "Save" button. And then click the “Next” button. Then this will take you to the physical and chemical properties worksheet page. And here you can enter in any type of physical or chemical property data you may have. So you'll click the property dropdown menu and select the chemical property and then click the "Add Property" button. And then this generates chemical property kind of field set.

And you can enter in your values (inaudible) specific data. And then select measured or estimated in the dropdown menu to indicate whether, you know, you measured or you estimated your values. And then you can check the CBI checkbox to indicate the information is confidential and you can hit the "Save" button, save your information.

Then we'll click the “Next” button. And then this takes you to the physical and chemical properties worksheet continued optional page, where you can attach documentation for your physical and chemical properties data. So you click the "Attach Document" button. You actually see the physical chemical property type value.

And if you select physical and chemical property, then you can – that enables the chemical property checkboxes. You can, you know, say this document I'm going to upload is related to this chemical property type of data. Attach documentation and then click the “Next” button.

But I'm going to go ahead and also kind of demonstrate the polymer field. So we'll go ahead and click the consolidated chemical link in navigation tree. We'll click the – we'll select the "Polymer” radio button and then we'll enter in chemical (inaudible). Click the “Next” button and you have your chemical folder in the navigation tree. On the primary identification information page, you'll click the "Add New Chemical" button to identify your polymer information. Select an ID method.

Kathy Schechter: Because it's consolidated.

(Kacie Howard): And then we'll enter in (inaudible). And then we'll attach any kind of supporting documentation we might have. We'll enter in the description, the number of pages. And then we'll click the "Save" button to save the information and then we click the “Next” button.

And then this takes you to the monomers and other reactant page. So you can indicate the method of measurement in which polymer weight is recorded. So we can select the "(GPC) Radio" button or the "Other Radio" button. If you do select the "Other” radio button you have to specify the other method measurement in the text field. And then you can check the CBI checkbox to clean the polymer weight information as confidential.

And then here you can enter in the number average weight, the lowest number average molecular weight of the polymer, the maximum weight percentage below 500 molecular weight and then the max weight percentage below 1,000 molecular weight.

And then in the monomers and other reactant section, you can click the "Add Monomer" button to add – to add the monomers. If you click the "Add Monomer" button, you can click the "Search SRS" button to search for or identify your monomer. Enter in the chemical name at a minimum and then click the "OK" button. So your chemical information will show up in the chemical information field.

And then you'll enter a typical composition percentage and the maximum residual percentage. You can check the CBI checkbox to claim the monomer or chemical information is confidential. You can check the typical composition CBI checkbox to claim typical composition information confidential and then the maximum residual CBI checkbox.

And after you're done, you can just click the "Save" button to save your entered information. And then you can click the "Attach Document" button to attach any supporting, you know, monomers information that you have. All right.

So next we'll go back to where we were originally. So we'll go back, we'll go to the site information page. So on the site information page, you can identify whether you have sites control by the submitter or if you have sites control by others.

If you select the "Yes Radio" button, that actually generates your site folder to the navigation tree. You can select the "Yes” radio button and “Next” button. And then this takes you to the Site Control by Others page. And then on the Sites Control by Others page, you can indicate whether you have any sites control by others. We can select the "Yes" or the "No” radio button.

If you do select the "Yes” radio button, then application will ask you if you have any site-specific information. You can say yes or no. And then you can enter in the number of unknown sites that you have. This could be zero. And then you can also check the CBI checkbox to claim the number of unknown sites information confidential also.

Once you're done here, you can click the “Next” button. And then depending on what you selected on your previous pages, you know, you'll get taken to either the submitter-controlled operation or operations controlled by others folder. But here we'll just – on the Submitter Operation Information page you have an operation (inaudible) field so you can enter in your operation (inaudible) which is a required field if you have a joint submission or letter support pending.

And then here you can identify the facility. So click "Add Facility" button and then you can – which generates the Add Facility window. And then you can select the site from the facility dropdown menu.

Kathy Schechter: And how do we get those?

(Kacie Howard): (OK). So the values that – or basically the sites that you see within the facility dropdown menu were identified when you register. So if you don't see any sites, it might be because, you know, you didn't add any – didn't add any site when you registered and should (log out) and go and do that.

Kathy Schechter: To have a more detailed explanation of how to add your facilities, you can go to the CDX registration webinar from three weeks ago posted on our – under chemicals website.

(Kacie Howard): Right. But for now we'll select the site from the facility dropdown menu and then you can enter in a site (alias) and that you can check the CBI checkbox to claim the site information is confidential. And, again, if you have a joint submission or letter support pending then the site (inaudible) is required. And then after you are happy with this, then you click the "Add Facility" button. And so it (send) your facility information (inaudible) within your facility table.

So here you have some chemical checkboxes which (inaudible) the chemical you've identified within the form so you'll select the chemical. Basically, this site pertains to the check – chemical checkbox, monomer chemical checkboxes.

And then here you can identify the type of operations. So you can check the manufacturing checkbox, processing checkbox and/or the use checkbox. And then you can check the CBI checkbox to claim the operation type is confidential also.

And then in the operation description section, you can select the "Batch Radio" button or the "Continuous Radio" button to indicate, you know, whether you're manufacturing chemicals on a batch process or on a continuous basis. And then you can enter in your values. (inaudible) programs for batch. Okay. And then if you want to claim the amount and duration information as confidential, you can check the CBI checkbox.

And then you can enter in a process description or upload a document, so you can enter in process description text and then to check the CBI checkbox if you claim the process description information is confidential.

And then the “Next” button. And then this takes you to the occupational exposures page. So you'll click the “Add” button to add an occupational exposure which generates this field. So you'll select a worker category in the worker category dropdown menu. And a worker activity in the worker activity dropdown menu.

You can check the CBI checkbox to claim these values as confidential. And then you can enter in an equipment or engineering controls that you may have. And you can check the CBI mining checkboxes to say this information is confidential and binding.

And then you can enter in any physical form. Percentage of the new substance. The number of workers that are exposed within the maximum duration you're exposed in hours per day and days per year.

And then click the save button once you're done. So you click the “Next” button and then this takes you the environmental releases page. Then you click the “Add” button to add an environmental release and disposal.

You'll enter in a release number from your -- from your diagram previously. And then you can select the -- to environment radio button or the -- to control technology radio button to indicate where the -- this substance is released and then you can check the applicable kilograms per day or kilograms per batch radio button.

To -- and then you can select a medium release from the medium release dropdown menu. And then enter in a control technology description into the control technology description text field. And then (inaudible) factor control technology.

And then you check the CBI checkbox to claim, you know, these associated fields as confidential or binding. And then once you're done, you can click the save button. And then here, you can mark the destination release to water so you can enter a publicly owned treatment works name.

You can enter a navigable waterway name. Then you can enter in one other name -- some other name that you can also enter in any of these number. And then you can check the CBI checkbox to claim any of these fields as confidential. Then you can click the "Next" button.

Kathy Schechter: After you choose the Nipties numbers in the format, if you go to the geological site or something like that which list the Nipties numbers, that should tell you the proper format for a Nipties number. Just FYI.

(Kacie Howard): And then once you click the "Next" button if you identified operations control by others, you'll get taken to the industrial sites control by others page. You'll enter in an operation alias here. And then you can click the add facility button to identify facility.

Then click the add facility button. And then you can select the chemical that this operation pertains to and then enter in an operation description. And you can attach any supporting documentation at the bottom here.

Then click the "Next" button.

Kathy Schechter: Just an FYI for sites controlled by the submitter versus sites controlled by others, if you have a (inaudible) manufacturer, they are under your control so it should be under sites controlled by the submitter. Just FYI.

(Kacie Howard): Okay. Good to know. And then so on the exposures and releases page, you'll click the "Add" button to add a worker exposure. So then within the worker exposure field set, you'll enter in a letter of activity.

You'll enter in the number of workers exposed and then the duration exposure, hours per days and then days per year. And then enter in any type of protective equipment or engineering controls.

Enter in the physical form. And the percentage new substance and the percentage and formulation. And then you can check the CBI checkbox here on the right to claim, you know, any of these fields says confidential.

This is the letter of activity, workers exposed, protective equipment. And then when you're done, you can click the save button. And then you can click an “Add” button to add an environmental disposal.

This generates the environmental disposal field set. You'll enter in a release number. You can check the CBI checkbox to claim the release is confidential. You can enter in an amount new substance released directly into the environment and then select the kilograms per day or kilograms per batch radio button.

And then enter in a value for the amount new substance released directly into control technology. And select the kilograms per day or kilograms per batch radio button. And then you'll select a value media release from the media release dropdown menu.

And then you can enter in -- and you have control technology into the control technology text field and click the save button. When -- click the “Next” button. And then this takes you to the byproduct information page.

So just identify any byproducts that might result. And you can check the CBI checkbox that's saying the byproduct information is confidential. And you can (inaudible), you know, add any additional byproducts if you want.

Then we'll click the “Next” button. And then this takes you to the optional pollution prevention page. So you can enter in any information that wasn’t provided elsewhere regarding your efforts towards pollution prevention I guess.

And then you can enter in information or you can attach supporting documentation and then check the CBI checkbox that's saying this information is confidential.

Kathy Schechter: Yes, one of the changes that we made with this software compared to the (inaudible) software is we found a lot of people not properly identifying CBI claims within the large text box. That means on the cover letter or the (inaudible) and prevention page and so we've decided to make these fields an all or nothing CBI.

So you no -- you no longer have to use the curvy brackets. We will consider everything in this text box CBI if you mark it as compliance.

(Kacie Howard): Right. You can enter in your information in the (inaudible) CBI if you want or attach any type of documentation. And then click the "Next" button. And then this takes you to the additional attachment page.

So this page is just -- you can attach any type of documentation that might not belong elsewhere in the form. And then you can click the "Next" button. Yes, attaching documentation -- additional documentation is optional.

This is just in case you want to add anything else that didn't seem it belonged somewhere else within the form.

Kathy Schechter: Like for example health -- health toxicity data or ecotoxicity data. They aren't really added at any other point in the form.

(Kacie Howard): Okay. So then after you click the "Next" button, this takes you to the attachment summary page. And this is just a -- basically it's a summary of all the documents that you've uploaded within the form.

Kathy Schechter: And it gives you the location for which it was uploaded so in case you need to go back to that site to either change that document or edit that document, you can see exactly what section it belongs with.

(Kacie Howard): Right. (inaudible) here. And then if you're done, you can click then "Next" button. And then this takes you to the optional cover letter screen and so you can enter in any type of cover letter text that you want to.

And then you can check the CBI checkbox that's saying your cover letter text is confidential. And then you can click the "Next" button. And then if you do have pending joint submission or a letter of support, then you'll be taken to this screen.

So here, on the joint submitter information page, you can enter in your contact information for your joint submitter. So you'll enter in the -- your joint submitter's first name, last name, their job title or position if you want, the company name, the phone number.

The email address isn't required but suggested. The mailing address, the city -- you'll select the state in the state dropdown menu and then you'll enter the postal code. And then you check the CBI checkbox to claim the joint submitter information is confidential.

Kathy Schechter: As you can see down at the very bottom, the country is already selected as the United States and does not allow you to change it so that's why we want the joint submitters to be only US companies.

And as you can see from what (Kacie) is doing, it does store information that has previously been entered.

(Kacie Howard): This is just a feature of Chrome though. So it's not applicable for media -- all browsers.

Kathy Schechter: Just FYI, some browsers behave differently than others.

(Kacie Howard): Right. You can enter in your joint submitter information and then you can click the "Next" button. And then this takes you to the joint submission information screen. And here, you can enter in any type of additional instructions you want the joint submitter to have.

This will be included in their email that you send. And then when you want to send them an email verifying them of the joint submission, you just click the notify the secondary submitter of the joint submission.

Kathy Schechter: The information that you should include would be your instructions about what information you expect the joint submitter to supply. So, for example, if they are giving sites controlled by others, then you should probably write in there please contain the information that would pertain to (PMN) pages nine and ten.

So that way, they know, you know, what sorts of information that you expect them to supply.

(Kacie Howard): So click the notify the secondary submitter of the joint submission link. And then this shows kind of like the notification window you'll see. So on the notification window, you can check the chemical checkbox that the joint submitter will be reporting for.

So you can check the chemical one and/or chemical two checkbox. And then this will display, you know, who it's going to -- the joint submitter email address automatically populates the two field and then you will also automatically CC.

And then you can add in any additional comments here and then click the send button. Okay. Then we'll click the “Next” button. So if you -- if you don’t actually go through with it, then it does warn you. You didn’t notify them.

Just go past that though. And then if have letter of support submitter pending then this takes you to the letter of support submitter information page. So you can enter in the letter of support submitter's contact information here.

And these have the same fields as the joint submission except that the letter of support submitter doesn’t have to be from the US. They can be from a non-US country and then fill the state dropdown menu, is it required.

And then if you want to claim the letter of support submitter information is confidential, you can check the CBI checkbox. And then if you -- then you can click the "Next" button, then this takes you to the letter of support submission information screen.

So you can enter in any information that you want letter of support submitter to have and then click the -- notify the secondary submitter of the letter of support submission link to send your email.

Okay. So then that the end of the (PMN) form. So next, we'll actually discuss how the form is validated. So after you finish your form, you can validate before you submit. So you can click the validate icon in the bottom action bar.

Kathy Schechter: I have to make sure that your pop-up blocker is turned off.

(Kacie Howard): Right.

Kathy Schechter: And check to make sure because it opens up in a second window. Sometimes it's behind your current window. So look around for a second browser window.

(Kacie Howard): Okay.

Kathy Schechter: Not only does the validate button check to make there's no errors but when you go from screen to screen, it validates for required information and if you do not have the required information on that screen, it'll give you the error at the top of the screen.

(Kacie Howard): Right. Whereas if you navigate, you can do navigation -- you know, you could potentially not see some information. So with this validation pop-up window, you can see that, you know, you have some warnings and you can click the link to go back to the page where the error message or the warning comes from.

And then so next, we'll cover to upload XML process. So basically within the bottom left-hand side of your page, you'll see this upload XML button. You'll click the upload XML button, you'll be taken to the upload XML page.

And you can upload -- click the upload archive file to basically upload either a (inaudible) file or maybe an XML file from a copy of record or maybe an in-progress (PMN) form you have that was saved as an XML file. And then you can click the export XML link to export basically any in progress form you have. So next...

Female: (inaudible)

(Kacie Howard): The next we'll kind of -- we'll show some additional pointers regarding upload XML.

Female: Bear with us. There are (inaudible). Do you see this? Do you see it now?

(Kacie Howard): (inaudible). That's fine. The (inaudible)

Male: (inaudible)

(Kacie Howard): Okay. Okay. All right. Okay. So the upload XML functionality only applies to a (PMN) form. If you are uploading an (inaudible) file, then no changes are required to your file. But if you're uploading an XML, then the XML file has to be formatted before you upload it into a (PMN) form.

So you have to name the XML file form data .XML and then you'll create a zip file and add your form data XML file to the zip file. But the zip file can be renamed however you wish. And then there's a modified XML schema which is generated by an outside source based on the section five XML schema.

Kathy Schechter: The XML schema can be found on the new chemicals website under the forms and information.

(Kacie Howard): Okay. And then just a couple notes regarding that's imported via upload XML. So if you do upload an XML file into an existing form, it will actually overwrite the content of your current form so just beware of that.

Imported data still has to have validation. And then when you upload data there are some items that are imported including documents which have to be reattached. Any sites that you might not have associated with your registration profile have to be added to your CDX profile.

And then you should -- you should still check the populated data for completeness including dropdown menus and validate the form. Some data might populate differently. Okay. So next review how you can kind of preview CBI and non-CBI (inaudible) file of a form.

So within your application, you'll click the preview that displays within the bottom action bar. And then the preview (EPMN) form displays with an option to either view the full version of the form or standardized version of a form and then you can click either button.

But if you obviously don’t make any CBI claims, then the two versions will be the same. Then after you make a selection, your PDF will kind of process and then your completed PDF will show up on the print preview page.

So next, we'll discuss how a secondary submitter creates a joint submission. Okay. So a joint submitter will log in and click the start new form button on the section five notices and support forms page.

And then on the create (pass phrase) -- (pass phrase) screen, we'll actually enter in the unique identifier that was provided by the primary submitter within their email. And then they'll create a (pass phrase) and then click the “Next” button.

And then this takes you to the general form information page. And then you can click the “Next” button. And then we'll just go over really quick. On the chemical identification page, you'll actually check the checkbox of the chemical that you'll be providing information.

Kathy Schechter: Yes, what's important to know is that you're given the same fields that are on a primary (PMN) form and it's up to the joint submitter to identify which sections need to be applied and he only needs to go to those particular pages. He does not have to fill out everything.

(Kacie Howard): Okay. I think only technical contact actually is required.

Kathy Schechter: Yes. So if they are entering chemical identity information, then they have to go to this screen and then add a new chemical.

(Kacie Howard): Yes. Okay. You can continue on and click the “Next” button. So next, we'll cover how the secondary submitter creates a letter of support. The create (pass phrase) process is the same. They'll get a unique identifier and then they'll create the (pass phrase) and form the (pass phrase) and click the “Next” button.

So the general form information page display. You can click the “Next” button.

Kathy Schechter: Yes, essentially there's not any difference between what they have the option to fill out between a joint and a letter of support. You can fill out pages of the (PMN) form or you can fill out the information in a cover letter.

Like (Kacie) said, the only thing that validates is a technical contact. And, of course, when you submit it, we'll populate the authorized official information.

(Celine): I think -- sorry, just to chime in here. Someone asked the question and it's probably an important one to touch upon is whether the joint submitters can see the primary information that they put in to the submission. So that's probably important to touch on.

Kathy Schechter: Okay. The primary submission is done by company A and is seen by persons within company A or those designated persons to which have access to the form. No information is conveyed between the main submitter (inaudible) support submitter.

The only thing that gets transferred over so to speak is the identifier for which they use to create their form. Please note that we still would like a TS number to be designated within those forms so that we can link them together here to the agency besides the identifier which does it electronically.

We would like to see the fact that the TS number is shared between both documents so that when we have the PDF, we're able to note that. Also, fill in in the cover letter for both parties. The information is to who is going to supply which information and that way, we can know whether or not the confidentiality is on both parts.

In other words, company B doesn’t -- is not going to be sharing the information with company A and vice versa.

(Kacie Howard): Okay.

(Celine): (Kacie), also, if you want to maybe just back up. Someone asked and it might be a delay in the actual web and how fast you're moving on the screen but someone asked how you actually got to create a joint submission.

So if you want to back up to the first screen, people -- how they got there. I don’t know if we show it on here, do we?

(Kacie Howard): (inaudible)

Kathy Schechter: Yes, you -- the secondary submitter would launch CDX and in the my CDX box, they would select secondary authorized official. That would take them to the same workflow as you do for the (EPMN) where they choose the (EPMN) from the submission type that they're going to open.

And then from the (EPMN), you go to the forms screen. At the bottom of the forms screen, you say select to create new form and then you would have your option of joint or letter of -- I think it would automatically know which one it is based on your identifier, does it?

(Kacie Howard): No, you actually -- when if you log in as a secondary AO, you just see the start new form button. There's no option to select a formatting.

Kathy Schechter: Okay.

(Kacie Howard): The unique identifier kind of like populates or identifies they type of form that you'll be creating, so.

(Celine): Do you have -- so this might derail (inaudible) quickly but do you have CDX opened and do you have -- you can just show someone how to get there.

(Kacie Howard): Yes, I can model that real quick and (inaudible)

(Celine): Yes. I think it's probably beneficial for folks.

(Kacie Howard): Okay. So one second.

Kathy Schechter: Okay. Yes, we have to get over into...

(Kacie Howard): Yes.

Kathy Schechter: ...sharing your screen again.

(cross talk)

Kathy Schechter: Okay. It's there.

(Kacie Howard): Okay.

Kathy Schechter: Oh, please. Yes. (inaudible). So (Kacie) is entering in her username and password for the CDX account.

(Kacie Howard): So, you know, you'll log in on CDX. And then you'll click the secondary authorized official link, the (CSTP).

Kathy Schechter: The (CSTP), yes.

(Kacie Howard): And then service. And then you'll select (EPMN) in the dropdown menu. And then on the forms page -- forms page...

Kathy Schechter: Sometimes it takes a minute for the forms page to come up. I've noticed that, too. (inaudible). I found it again. It's probably still turning but I think it's the same concept as logging in as a primary AO, (Celine), an original (PMN). There it goes.

(Kacie Howard): So once you get to the forms page, you'll click the start new form button.

Kathy Schechter: Yes, you only have one option of, you know, joint/letter support and then you just click start new form.

(Kacie Howard): Right. So click the start new form button and then you can, you know, copy and paste your unique identifier into the unique identifier field. And you'll create (pass phrase) -- confirm your (pass phrase) and then you'll click the “Next” button.

And then the application will know, you know, what you're trying to create basically. So that's how you create.

Kathy Schechter: So technically there is no difference within the application between a joint letter support with regards what options are available for you to fill in. The only difference is the joint has to be United States submitter and a letter of support could be either, US or non-US.

(Kacie Howard): All right. So with that, let's go back and (inaudible). All right.

(cross talk)

(Kacie Howard): So actually -- so and within the form, you can attach any type of additional information you want...

(Kacie Howard): ...whether your manufacturing chemical's on a -- on a batch process or on a (inaudible) And then you can enter in your values (inaudible) programs for batch. Okay. And then if you want to claim the amount of duration information as confidential, you can check the CBI checkbox.

And then you can enter in a process description or upload a document that you can enter in process description text and then to check the CBI checkbox if it's saying the process description information is confidential.

And then the “Next” button. And then this takes you to the occupational exposure page. So you'll click the “Add” button to add an occupational exposure which generates this field. So you'll select a worker category in the worker category dropdown menu. And a worker activity in the worker activity dropdown menu.

You can check the CBI checkbox to claim these values as confidential. And then you can enter in an equipment or engineering controls that you may have.

And you can check the CBI mining checkboxes to say this information is confidential and binding.

And then you can enter in any physical form. Percentage of the new substance. The number of workers that are exposed within the maximum duration you're exposed in hours per day and days per year.

And then click the save button once you're done. So you click the “Next” button and then this takes you the environmental releases page. Then you click the “Add” button to add an environmental release and disposal.

You'll enter in a release number from your -- from your diagram previously. And then you can select the -- to environment radio button or the -- to control technology radio button to indicate where the -- this substance is released and then you can check the applicable kilograms per day or kilograms per batch radio button.

To -- and then you can select a medium release from the medium release dropdown menu. And then enter in a control technology description into the control technology description text field. And then (inaudible) factor control technology.

And then you check the CBI checkbox to claim, you know, these associated fields as confidential or binding. And then once you're done, you can click the save button. And then here, you can mark the destination release to water so you can enter a publicly owned treatment works name.

You can enter a navigable waterway name. Then you can enter in one other name -- some other name that you can also enter in any of these number. And then you can check the CBI checkbox to claim any of these fields as confidential. Then you can click the “Next” button.

Kathy Schechter: After you choose the Nipties numbers in the format, if you go to the geological site or something like that which list the Nipties numbers, that should tell you the proper format for a Nipties number. Just FYI.

(Kacie Howard): And then once you click the “Next” button if you identified operations control by others, you'll get taken to the industrial sites control by others page. You'll enter in an operation alias here. And then you can click the add facility button to identify facility.

Then click the add facility button. And then you can select the chemical that this operation pertains to and then enter in an operation description. And you can attach any supporting documentation at the bottom here.

Then click the “Next” button.

Kathy Schechter: Just an FYI for sites controlled by the submitter versus sites controlled by others, if you have a (inaudible) manufacturer, they are under your control so it should be under sites controlled by the submitter. Just FYI.

(Kacie Howard): Okay. Good to know. And then so on the exposures and releases page, you'll click the “Add” button to add a worker exposure. So then within the worker exposure field set, you'll enter in a letter of activity.

You'll enter in the number of workers exposed and then the duration exposure, hours per days and then days per year. And then enter in any type of protective equipment or engineering controls.

Enter in the physical form. And the percentage new substance and the percentage and formulation. And then you can check the CBI checkbox here on the right to claim, you know, any of these fields says confidential.

This is the letter of activity, workers exposed, protective equipment. And then when you're done, you can click the save button. And then you can click an “Add” button to add an environmental disposal.

This generates the environmental disposal field set. You'll enter in a release number. You can check the CBI checkbox to claim the release is confidential. You can enter in an amount new substance released directly into the environment and then select the kilograms per day or kilograms per batch radio button.

And then enter in a value for the amount new substance released directly into control technology. And select the kilograms per day or kilograms per batch radio button. And then you'll select a value media release from the media release dropdown menu.

And then you can enter in -- and you have control technology into the control technology text field and click the save button. When -- click the “Next” button. And then this takes you to the byproduct information page.

So just identify any byproducts that might result. And you can check the CBI checkbox that's saying the byproduct information is confidential. And you can (inaudible), you know, add any additional byproducts if you want.

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So you no -- you no longer have to use the curvy brackets. We will consider everything in this text box CBI if you mark it as compliance.

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Kathy Schechter: And it gives you the location for which it was uploaded so in case you need to go back to that site to either change that document or edit that document, you can see exactly what section it belongs with.

(Kacie Howard): Right. (inaudible) here. And then if you're done, you can click then "Next" button. And then this takes you to the optional cover letter screen and so you can enter in any type of cover letter text that you want to.

And then you can check the CBI checkbox that's saying your cover letter text is confidential. And then you can click the "Next" button. And then if you do have pending joint submission or a letter of support, then you'll be taken to this screen.

So here, on the joint submitter information page, you can enter in your contact information for your joint submitter. So you'll enter in the -- your joint submitter's first name, last name, their job title or position if you want, the company name, the phone number.

The email address isn't required but suggested. The mailing address, the city -- you'll select the state in the state dropdown menu and then you'll enter the postal code. And then you check the CBI checkbox to claim the joint submitter information is confidential.

Kathy Schechter: As you can see down at the very bottom, the country is already selected as the United States and does not allow you to change it so that's why we want the joint submitters to be only US companies.

And as you can see from what (Kacie) is doing, it does store information that has previously been entered.

(Kacie Howard): This is just a feature of Chrome though. So it's not applicable for media -- all browsers.

Kathy Schechter: Just FYI, some browsers behave differently than others.

(Kacie Howard): Right. You can enter in your joint submitter information and then you can click the "Next" button. And then this takes you to the joint submission information screen. And here, you can enter in any type of additional instructions you want the joint submitter to have.

This will be included in their email that you send. And then when you want to send them an email verifying them of the joint submission, you just click the notify the secondary submitter of the joint submission.

Kathy Schechter: The information that you should include would be your instructions about what information you expect the joint submitter to supply. So, for example, if they are giving sites controlled by others, then you should probably write in there please contain the information that would pertain to (PMN) pages nine and ten.

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(Kacie Howard): So click the notify the secondary submitter of the joint submission link. And then this shows kind of like the notification window you'll see. So on the notification window, you can check the chemical checkbox that the joint submitter will be reporting for.

So you can check the chemical one and/or chemical two checkbox. And then this will display, you know, who it's going to -- the joint submitter email address automatically populates the two field and then you will also automatically CC.

And then you can add in any additional comments here and then click the send button. Okay. Then we'll click the “Next” button. So if you -- if you don’t actually go through with it, then it does warn you. You didn’t notify them.

Just go past that though. And then if have letter of support submitter pending then this takes you to the letter of support submitter information page. So you can enter in the letter of support submitter's contact information here.

And these have the same fields as the joint submission except that the letter of support submitter doesn’t have to be from the US. They can be from a non-US country and then fill the state dropdown menu, is it required.

And then if you want to claim the letter of support submitter information is confidential, you can check the CBI checkbox. And then if you -- then you can click the “Next” button, then this takes you to the letter of support submission information screen.

So you can enter in any information that you want letter of support submitter to have and then click the -- notify the secondary submitter of the letter of support submission link to send your email.

Okay. So then that the end of the (PMN) form. So next, we'll actually discuss how the form is validated. So after you finish your form, you can validate before you submit. So you can click the validate icon in the bottom action bar.

Kathy Schechter: I have to make sure that your pop-up blocker is turned off.

(Kacie Howard): Right.

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And then so next, we'll cover to upload XML process. So basically within the bottom left-hand side of your page, you'll see this upload XML button. You'll click the upload XML button, you'll be taken to the upload XML page.

And you can upload -- click the upload archive file to basically upload either a (inaudible) file or maybe an XML file from a copy of record or maybe an in-progress (PMN) form you have that was saved as an XML file. And then you can click the export XML link to export basically any in progress form you have. So next...

Female: (inaudible)

(Kacie Howard): The next we'll kind of -- we'll show some additional pointers regarding upload XML.

Female: Bear with us. There are (inaudible). Do you see this? Do you see it now?

(Kacie Howard): (inaudible). That's fine. The (inaudible)

Male: (inaudible)

(Kacie Howard): Okay. Okay. All right. Okay. So the upload XML functionality only applies to a (PMN) form. If you are uploading an (inaudible) file, then no changes are required to your file. But if you're uploading an XML, then the XML file has to be formatted before you upload it into a (PMN) form.

So you have to name the XML file form data .XML and then you'll create a zip file and add your form data XML file to the zip file. But the zip file can be renamed however you wish. And then there's a modified XML schema which is generated by an outside source based on the section five XML schema.

Kathy Schechter: The XML schema can be found on the new chemicals website under the forms and information.

(Kacie Howard): Okay. And then just a couple notes regarding that's imported via upload XML. So if you do upload an XML file into an existing form, it will actually overwrite the content of your current form so just beware of that.

Imported data still has to have validation. And then when you upload data there are some items that are imported including documents which have to be reattached. Any sites that you might not have associated with your registration profile have to be added to your CDX profile.

And then you should -- you should still check the populated data for completeness including dropdown menus and validate the form. Some data might populate differently. Okay. So next review how you can kind of preview CBI and non-CBI (inaudible) file of a form.

So within your application, you'll click the preview that displays within the bottom action bar. And then the preview (EPMN) form displays with an option to either view the full version of the form or standardized version of a form and then you can click either button.

But if you obviously don’t make any CBI claims, then the two versions will be the same. Then after you make a selection, your PDF will kind of process and then your completed PDF will show up on the print preview page.

So next, we'll discuss how a secondary submitter creates a joint submission. Okay. So a joint submitter will log in and click the start new form button on the section five notices and support forms page.

And then on the create (pass phrase) -- (pass phrase) screen, we'll actually enter in the unique identifier that was provided by the primary submitter within their email. And then they'll create a (pass phrase) and then click the “Next” button.

And then this takes you to the general form information page. And then you can click the “Next” button. And then we'll just go over really quick. On the chemical identification page, you'll actually check the checkbox of the chemical that you'll be providing information.

Kathy Schechter: Yes, what's important to know is that you're given the same fields that are on a primary (PMN) form and it's up to the joint submitter to identify which sections need to be applied and he only needs to go to those particular pages. He does not have to fill out everything.

(Kacie Howard): Okay. I think only technical contact actually is required.

Kathy Schechter: Yes. So if they are entering chemical identity information, then they have to go to this screen and then add a new chemical.

(Kacie Howard): Yes. Okay. You can continue on and click the “Next” button. So next, we'll cover how the secondary submitter creates a letter of support. The create (pass phrase) process is the same. They'll get a unique identifier and then they'll create the (pass phrase) and form the (pass phrase) and click the “Next” button.

So the general form information page display. You can click the “Next” button.

Kathy Schechter: Yes, essentially there's not any difference between what they have the option to fill out between a joint and a letter of support. You can fill out pages of the (PMN) form or you can fill out the information in a cover letter.

Like (Kacie) said, the only thing that validates is a technical contact. And, of course, when you submit it, we'll populate the authorized official information.

(Celine): I think -- sorry, just to chime in here. Someone asked the question and it's probably an important one to touch upon is whether the joint submitters can see the primary information that they put in to the submission. So that's probably important to touch on.

Kathy Schechter: Okay. The primary submission is done by company A and is seen by persons within company A or those designated persons to which have access to the form. No information is conveyed between the main submitter (inaudible) support submitter.

The only thing that gets transferred over so to speak is the identifier for which they use to create their form. Please note that we still would like a TS number to be designated within those forms so that we can link them together here to the agency besides the identifier which does it electronically.

We would like to see the fact that the TS number is shared between both documents so that when we have the PDF, we're able to note that. Also, fill in in the cover letter for both parties. The information is to who is going to supply which information and that way, we can know whether or not the confidentiality is on both parts.

In other words, company B doesn’t -- is not going to be sharing the information with company A and vice versa.

(Kacie Howard): Okay.

(Celine): (Kacie), also, if you want to maybe just back up. Someone asked and it might be a delay in the actual web and how fast you're moving on the screen but someone asked how you actually got to create a joint submission.

So if you want to back up to the first screen, people -- how they got there. I don’t know if we show it on here, do we?

(Kacie Howard): (inaudible)

Kathy Schechter: Yes, you -- the secondary submitter would launch CDX and in the my CDX box, they would select secondary authorized official. That would take them to the same workflow as you do for the (EPMN) where they choose the (EPMN) from the submission type that they're going to open.

And then from the (EPMN), you go to the forms screen. At the bottom of the forms screen, you say select to create new form and then you would have your option of joint or letter of -- I think it would automatically know which one it is based on your identifier, does it?

(Kacie Howard): No, you actually -- when if you log in as a secondary AO, you just see the start new form button. There's no option to select a formatting.

Kathy Schechter: Okay.

(Kacie Howard): The unique identifier kind of like populates or identifies they type of form that you'll be creating, so.

(Celine): Do you have -- so this might derail (inaudible) quickly but do you have CDX opened and do you have -- you can just show someone how to get there.

(Kacie Howard): Yes, I can model that real quick and (inaudible)

(Celine): Yes. I think it's probably beneficial for folks.

(Kacie Howard): Okay. So one second.

Kathy Schechter: Okay. Yes, we have to get over into...

(Kacie Howard): Yes.

Kathy Schechter: ...sharing your screen again.

(cross talk)

Kathy Schechter: Okay. It's there.

(Kacie Howard): Okay.

Kathy Schechter: Oh, please. Yes. (inaudible). So (Kacie) is entering in her username and password for the CDX account.

(Kacie Howard): So, you know, you'll log in on CDX. And then you'll click the secondary authorized official link, the (CSTP).

Kathy Schechter: The (CSTP), yes.

(Kacie Howard): And then service. And then you'll select (EPMN) in the dropdown menu. And then on the forms page -- forms page...

Kathy Schechter: Sometimes it takes a minute for the forms page to come up. I've noticed that, too. (inaudible). I found it again. It's probably still turning but I think it's the same concept as logging in as a primary AO, (Celine), an original (PMN). There it goes.

(Kacie Howard): So once you get to the forms page, you'll click the start new form button.

Kathy Schechter: Yes, you only have one option of, you know, joint/letter support and then you just click start new form.

(Kacie Howard): Right. So click the start new form button and then you can, you know, copy and paste your unique identifier into the unique identifier field. And you'll create (pass phrase) -- confirm your (pass phrase) and then you'll click the “Next” button.

And then the application will know, you know, what you're trying to create basically. So that's how you create.

Kathy Schechter: So technically there is no difference within the application between a joint letter support with regards what options are available for you to fill in. The only difference is the joint has to be United States submitter and a letter of support could be either, US or non-US.

(Kacie Howard): All right. So with that, let's go back and (inaudible). All right.

(cross talk)

(Kacie Howard): So actually -- so and within the form, you can attach any type of additional information you want and click the next button. And then actually we'll go back (in a form).

Kathy Schechter: (inaudible) talk about that not going to (inaudible).

(Kacie Howard): No, (inaudible).

Kathy Schechter: I can't see your screen.

(Kacie Howard): All right. So, log in (73) support form.

Kathy Schechter: (They are either) primary (inaudible) official or agent – primary agent to consultants and create the support form.

(Kacie Howard): Right. Log in to the primary (inaudible) official for now. (Get) the form a screen and then you'll select from the form type dropdown menu and then click the start new form button. Create a new (pass phrase) and then you click the next button and then – so, on the general form information page, you'll see your form (alias) which you can edit.

You can see the (case number field and the TS number field) and actually the case number field actually I think – but it actually you can enter in your case number field and you can enter in your (TS) number field and then you can select the type of support from the type of support dropdown menu.

I think there's a new (inaudible) here we have an amendment, suspension request, test data, transfer of ownership, withdrawal request for other correspondence.

Kathy Schechter: So, the new ones are suspension request and transfer of ownership.

(Kacie Howard): (inaudible).

Kathy Schechter: And nothing – that letter of support is no longer covered under the support form (like it was in the eTSCA) software. It's done through this other process where you register as a support as a secondary and then go through a separate workflow.

(Kacie Howard): And then you can check the EPA contractor chat box to indicate – to identify the requester that asked you to submit (inaudible) information. You enter in the last name in the last name field and then the first name and then you'll (fill that) EPA contractor or unknown...

Kathy Schechter: And we will not penalize you for misspelling.

(Kacie Howard): ... on the dropdown menu. And then you can save, delete or add your selection and then you can enter a description or (inaudible) of support and then you can check the (CBI) check box to claim (destination of the form) is confidential then you click the attach document button to the attach any supporting documentation.

If you do – and then if you go to the next button then you're taken to the original (inaudible) information page so you can enter in the information of the (AO) who submitted the original (inaudible) form that you're submitting the support form for. You can also copy, you know, your own (TS) registration information and then check the (CBI) check box to claim the original (submitter) information is confidential.

So, next we'll go through – we'll go...

Kathy Schechter: (inaudible) (at the end) but that's OK.

(Kacie Howard): We'll go through the submission process.

Kathy Schechter: (I guess) (inaudible).

(Kacie Howard): OK. All right. And then – and review how forms certification occurs. So, (in your form) you will click the submit icon that's displayed in the bottom action bar and then this takes you to the submitting official information page.

You can check the legally responsible certification statement check ox to indicate that you are the legally responsible party from the submitting company. You can also check the (CBI) check box to claim your submitter information as confidential. And once you're happy with the information that's displayed here you can click the next button.

If your form is some type of LVE or LoREX then you know, your certification statement will display you can review the statements and then click the I certify button. Then when you click the next button, the application validate your form. So, if you do have any errors (then they'll) – the application will (reply to you) that hey, you have some errors, you need (to fix this) and so you go back to the form and fix them.

But otherwise if your form (does that validation) it would generate a PDF. You can click the view PDF button to view the PDF or click the continue button to continue with the submission process then (if you) click the continue button this takes you to the (primary) certification page and this is where you certify that your form and all of your attachments were prepared accurately and completely to the best of your knowledge.

And then you can click the "I certify" button o this page to certify your form.

Kathy Schechter: Or you can hit the cancel button if you want to stop the submission process.

(Kacie Howard): If you do click the "I certify" button, this takes you to the (primary) log in page (where you're) entering your CDX password ad then click the next button. And then this takes you to the (primary) security question page and you can enter the answer (25) (inaudible) question that (displays) and then click the next button.

And then this takes you to the (primary) submission page and basically indicates that your submission was sent to EPA and then you can click the "finish" button which takes you back to the (inaudible).

So, after, you know, you submit your form you'll actually get an email. So, this is an example of a – this would be your submission has been received email and will tell you can, you know, download your copy of record now.

And so next, we'll kind of just – is just the copy of record process and reason for the copy of record is important. So, it's important to download the copy of record because the downloaded files are actually unencrypted and can be viewed and organized. And then in addition, a copy of record allows the user to keep every version of the submission because the section 5 think client only stores the latest version of a submission.

Kathy Schechter: Important, yes, very important.

(Kacie Howard): So, you know, when you're in your application – when you're in the application you click the forms (tab or link) and then you'll click the copy record icon (inaudible) green arrow that displays for submitted form and then you'll enter in your passphrase on the enter passphrase screen and click the next button.

And this takes to the (primary) log in page where you're entering your CDX password and click the "OK" button. And then this takes you to the (primary) security questions screen and you'll enter the answer to your (251) question that displays and you'll click the "OK" button.

And then your copy record will individual of process and generate and then it'll display on the download copy of record page and then you'll just click the copy record icon to download.

Kathy Schechter: It actually downloads your copy of record as a zip file which includes your (CBI) version, your (sanitized) version and all of your attachments.

(Kacie Howard): Right. Your XML file.

Kathy Schechter: And your XML file if you want to use those maybe to upload maybe you have a similar chemical and you want to upload the XML of a previously submitted form that's where you would find your XML.

(Kacie Howard): Right. So, next we'll discuss how amendments are created. So, for submissions that are sent from the eTSCA thick client, you should use this support form for PMN and biotechnology form type. And modified information will be provided in a text box and/or attachments.

For submissions that are sent from the e-PMN thin client, support form should not be used for amendments. (You) would – unless the submission – the original submissions be amendment you make your necessary edits you would enter the reason for the amendment on the amendment explanation page and then you would resubmit the form.

Kathy Schechter: Very important that you enter your information under the amendment explanation page because that way EPA when they receive that amendment will know what you've changed.

(Kacie Howard): Right. So, when you go to the forms page, you'll click the (lock) icon and you'll get this little pop-up message that say, you know, you're about to begin the amendment process so you click the "OK" button on the (top box). (The) within your PMN form on the – you would enter your reason for amendment on the amendment explanation page.

Kathy Schechter: It's at the very bottom of the navigator on the left below the optional cover letter.

(Kacie Howard): Right. So, you can enter in your amendment explanation and then you can resubmit. So, you know, if you have any additional questions – (more questions) then you can find, you know, additional resources on the resources page within the application including the user guide.

And then also, there's the TSCA hotline or the (CDS) help desk, the slides on (IO) from this session will be made available on this link and then you can email any remaining questions or comments you have to the eTSCA reporting at epa.gov.

Kathy Schechter: Thank you for your kindness and patience with us doing this demo. We will now open up the floor for questions and answers. We have a few questions that were submitted while we were doing the demonstration. So, we will kind of go over some of those. Some of them (inaudible) will probably need an explanation so we probably won't go over those here.

So, let me start with the ones that were submitted during the presentation and then we'll open the floor t those on the phone. First is what file types are acceptable. I think we explained a little bit but essentially it's PDF files, those in Microsoft so that includes PowerPoint, old version and the new version; (XLS), old version, new version, doc, docx, Rich Text Files or other text type files and image files as well as some files that are used for DNA, RNA or the microorganisms (inaudible) (.fas, .gbk and the .embl).

The next question was what is the definition of binding? And that actually has a couple of uses. For LVEs you are technically bound to what's in your submission with every field except for the production volume and a low volume exemption in order to be held to the volume that you state f it's less than 10,000 you have to mark the binding option otherwise we will assess at 10,000.

So, technically, every other binding option in the LVE form is redundant because you are already held to that. There are binding options in the PMN – for PMNs and that's pretty much understanding that you would be willing to bind in the instance that that case is regulated. You're not held to that binding option, it's just your willingness to bind in case it's regulated. So, that's essentially what the binding options mean.

The next one I think I'm going to skip. I could give a little (inaudible) but (inaudible). If a substance can only be isolated in a common solvent, should one include the properties of the solution. And the answer to that is with regards to the physical chemical properties page that is for 100 percent substance only. Do not report anything with regards to the properties of the solution. Inevitably, it's the property of the solvent and we don't really care.

So, what is (added into) the value of the physical property section. It all depends on which property that you select. If you select melting point it will tell you blank (degree C) to let you know that we would like your value in the (degree C – degree centigrade).

If it's water solubility, it'll give you the unit kilogram for your – per liter or something like that and then you'll either pick that or write – type that in, I can't remember exactly which one it is but we'll just make sure that the unit is included if it's not indicated.

For manufacturing (site), somebody asked how does one indicate that no manufacturing but one repackaging occurs. If you d not – OK – for substance that are actually created in the United States meaning that you take chemical

A and chemical B and make chemical C. Then on the PMN page three, you would mark the fact that you are manufacturing or creating your substance.

If it's not created in the United States and it's imported then you would market as import only under the sites controlled by the submitter or sites controlled by others mostly if the site is controlled by the submitter, if you're not creating it then you do not select manufacturing. You would select processing and that's what it means for repackaging. It would e that you're actually processing the material even if you're not making a formulation you're handling the material between containers (inaudible).

Can you cut and paste information into box to eliminate uploading individual documents. I'm not sure what you mean by that but you can use control C, control V. So, for example, if you have information on a word document, you'd copy and paste.

(Kacie Howard): I think there's a similar question out there, too, but if you actually need to browse to add an attachment or can you just paste that attachment into the (field).

Kathy Schechter: Yes, you actually have to hit the upload button and select a file...

(Kacie Howard): Yes.

Kathy Schechter: ... for it to upload the documents. it's very important that you have all the information there before you hit the save or (close) button because if you don't have all the information then you have to reupload your attachment and it gets very annoying so enter all your information first.

Is attaching documentation optional? In some instances, yes bit some instances no. Every document needs to – if there's no joint or letter of support indicated. If you do indicate a joint letter of support it does not validate anything beyond technical contact information.

If you do not have a joint letter of support then you need to at least include a chemical structure. That is one attachment that's absolutely necessary.

OK. Please clarify that joint submitters must be U.S. companies. Yes, we actually – joint and letter of supports are somewhat synonymous and in fact in the rules there's nothing really (inaudible) difference between them. For submitting purposes, we've denoted) a joint as somebody in the U.S. because technically it's a joint (field) in the PMN form and the PMN form requires them to be a U.S. (personnel) only.

So, that's what we're following is the paper version where joint submitters are U.S. only. Besides that, there's no other difference between the joint letter of support. OK. Can you repeat a comment that made with regards to (tool) manufacturers?

(Tool) manufacturers are technically sites controlled by the submitter. They are an agreement between the submitting company and the manufacturer where you have complete control over how much and what substance is created.

And so, therefore, we consider that sites controlled by the submitter. There might be, you know, things that (inaudible). So, therefore, you would (sell out) what we call PMN page eight for (tool) manufacturers.

Can the completed form be used again for a new PMN? As much as the information is the same that's where the import of the XML comes in. If you created a PMN either you're in progress or it's been submitted. If it's in progress, you can export the XML and then upload it into a new form that would copy all the information that you have in one form and have it put into the new form. But again it's only the fielded data. It does not include any of the attachments. You have to reupload the attachments.

If it is a form that has been submitted then you would need to take the copy of record, extract the XML that's in there. And as we said earlier you have to put that XML in both of these instances in the proper format before you can import it so, rename the XML as form data.xml import it or add it to a zip file ad then the import button should work.

And that's all I have for comments from submitters that were generated during the talk. So, we will now open the floor for persons on the phone.

Operators: And as a reminder, in order to ask question please press star then the number 1 on your telephone keypad, that is star 1. We'll pause for just a moment to compile a Q&A roster. And your first question comes from the line of (Claire Scott).

(Claire Scott): OK. So, I had added a question down below but I guess you (inaudible) (past it). If I am (Sonia Novie) and I'm in a (form) where I picked manufacture or import or both and I just picked manufacture but I don't bind that. And then later I want to import that material. DO have to submit a LVE modification?

Kathy Schechter: Yes. For LVEs, you are bound to what you have in your submission whether it's...

(Claire Scott): (If I change)...

Kathy Schechter: ... stated as (bound) or not. Now, there is the (J6) letter that always talk to (Dave Shoots) before you do that just to verify that you can use the (J6) exemption letter which is where you only have to submit a letter stating that you're making the following change without increasing releases and exposures.

(Claire Scott): OK. OK. That's what I thought.

Kathy Schechter: Always check with (Dave Shoots) with that.

(Claire Scott): I have one more since I've got you right here. Currently, you know, my thick client when I – when I prepare my forms and I save them electronically to my hard drive, if I want to go back in and look them right now, I open up my eTSCA software and I – and I look at them. I mean, I can also save the PDF but once we go to the thin clients, will I still have access to the thick client software so I can look at my electronic copies?

Kathy Schechter: The thick client software will be available and will be supported up until we go 100 percent with the thin client. The thick client will also be available after the (inaudible) downloaded it on your machine but it will no longer be supported, I think, with the help desk. So...

(Claire Scott): And upgrades won't be (inaudible).

Kathy Schechter: And upgrades will not occur.

(Claire Scott): So, I probably should make sure I have PDF with all my (inaudible).

Kathy Schechter: Correct. I would (take) anything – well, OK, what you have to realize and I think I put this in the Q&A but I will mention it here as well. Your old files that you have from the eTSCA client you do not need the software in order to see your information.

The files that are saved from the eTSCA client are zipped files. Inside those files are your ODF, if you finalized it, your sanitized versions if you finalized it and all attachments. So, you can take your .pmn_tscafile open it with (win zip) and see (inaudible) so to speak.

Female: (that) XML.

Kathy Schechter: It includes the XML also.

(Claire Scott): On the new client.

Kathy Schechter: On the (inaudible) client, the eTSCA client.

(Claire Scott): Oh, (inaudible)...

Kathy Schechter: OK. (Inaudible) created a zip file and you can see all of its context. So, if, say, in a year from now you no longer have (as a client) those files can be opened with (win zip) to see its contents.

(Claire Scott): That's only if you downloaded the COR the...

Kathy Schechter: Yes, the copy of record.

(Claire Scott): ... record.

Kathy Schechter: Yes.

(Claire Scott): If you – if you just, you know, when I – when I send them to my boss he's currently the one that submits them, I prepare them, I send them to him. When I do that, I create, you know, I save what I have prepared and sent to him and that's what's on my hard drive.

Female: Yes.

Kathy Schechter: I mean, in fact, I haven't done this and I wouldn't do it unless you make a copy but once the thick client is gone and you don't think you're ever going to use it again, you could even rename your files .zip just to tell you that it is a zip file and you can open it with (win zip).

(Claire Scott): OK.

Female: Can you use the XML to upload in the thin client ad then change it if you need to just like if you do...

Kathy Schechter: Yes. We went over how to import, it's already like we said a zip file so – and it's already in the proper format for uploading into the thin client because it has the XML's name form data.xml. It's in the proper format and it's in a zip file so you don't have to make any...

Female: Changes.

Kathy Schechter: ... special changes to that file to upload or import into the thin client.

Female: That was made – that was created by the thick client.

Kathy Schechter: Thick client, correct.

(Claire Scott): OK. Thank you.

Operator: Once again, as a reminder in order to ask a question please pres star, 1. Again that is star 1 on your telephone keypad. And your next question comes from the line of (Kathleen Roberts).

(Kathleen Roberts): Hi. Good afternoon. A completely different question but I'm wondering on the use (function) application is there ever going to be a pull down menu that will be similar to the use function and applications that are reported under the CDR.

Kathy Schechter: Somebody actually talked about that.

Female: (We're thinking – we're thinking yes, but)...

(Kathleen Roberts): OK.

Kathy Schechter: We're thinking of it but (I'm still) (inaudible). I like the flexibility to allow users to give us additional information than what might be in there. You wouldn’t believe how much – how important the information is that we not only know its function but its application, its, you know, anything that we can because it gives us an understanding of the chemical behavior during its use.

So, I'm not really how much that will apply in this instance but we have been discussing.

(Kathleen Roberts): Thank you.

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

(Carol Fanven): Sorry, I was on mute. Hi, Kathy. If in the future we need to file a PMN correction, how should I approach that?

Kathy Schechter: The software currently only deals with current submissions. We've added Bona Fide this year which is good. And we have been talking about adding additional things that we still require by paper one of those our inventory correspondences and inventory corrections. But we have not gone that way yet.

That will be a long and an involved process because we currently don't have any vehicle to get that in electronically so don't expect it in the near future but hopefully in the far future.

(Carol Fanven): OK. So, in other words, we don't amend the existing thin client file. We should just work outside of the CDX program.

Kathy Schechter: Correct.

(Carol Fanven): OK.

Kathy Schechter: Any inventory corrections are still done by paper.

(Carol Fanven): OK. Thanks.

Kathy Schechter: And in fact, in the amendment process the amending of a submission really should only be involved during the review process period. You shouldn't need to amend something after the process – review process is finished. If you wanted to add technical contacts or something like that I would do it as a support document and call it other correspondence.

Amending a submission after (it's past day 90) is kind of frowned upon.

Operator: And your next question comes from the line of (Anthony Castillo).

(Anthony Castillo): Yes. I was wondering for the – for (solely finder) or a search is it possible to have a (to the) (inaudible) added you know, in addition to the name because what happens – I don't know, maybe (we're the only committed about this), but there's about 10 (VA) assess coop and I have to keep on picking each one to find the right facility that I'm looking for.

Kathy Schechter: I think there is a city and state option. It might not be a bad idea to – I don't know if you can (actually forward) anything from SRS or from the facilities. I'm just trying to figure out a way to do all that.

So when you tried to do a search you think you'd just get your search returned as to large?

(Anthony Castillo): Well, I get a lot of names that are just (VA) assessed coop, for example. And, you know, it doesn't have any distinguishing feature. Or it doesn't have the city or state worked in. And, you know, I would be (going), say, for a free (forward) or (inaudible) specifically and it has to go on where the other, you know, site that we have, and eventually I will find the right one that I'm looking for.

Kathy Schechter: I do believe we are – we have talked with some other folks about cleaning up the sites. But I think that might be a slow process. That's all I can say.

And (only defense) is, you know, (COB) versus company or (SG) versus street. We'll need to go through a clean-up process to streamline the facilities.

Female: But would these changes be addressed in the city (BSF) instead of (Chicago's) now and…

Kathy Schechter: You do have the option to edit sites.

Female: OK.

(Anthony Castillo): OK. Is there any talent fee for, you know, adding a name, you know, (a current) real name just so that this thing were to (cite) from another one. Is that name used for anything, you know…

Kathy Schechter: It did get populated in the (BMN) form if you choose it that way.

(Anthony Castillo): OK. All right. I have another question about perhaps future enhancements, are we just going to fold this any time soon, because right now we have about, you know, over a dozen documents in our company, you know, page, you know, (forms) page. And it would be nice to be able to file them according to, let's say, for us it would be business group or whatever.

Kathy Schechter: Yes. (Anne) and I were actually talking about that and then talking about our other options. We are trying to discuss amongst ourselves ways to make finding your document easier. I don't know if we can actually use the folder option but there might be some other options out there.
(Anna) and I were – I was trying to explain to (Anna) that take advantage of the alias. So, for example, if you think of an alias as a file name how would you find the file? Or you may have a file within the folder that's within a folder, within a folder.

So maybe your alias could be called folder one, folder two, file name.

(Anthony Castillo): Right.

Kathy Schechter: So, to organize it that way, and so, everything with the first two folders would be grouped together or something like that. You know, it's – the best way that you can use the alias to help you organize it.

Female: And maybe if they have some good ideas maybe they can pass them along…

Kathy Schechter: Yes, please.

(Anthony Castillo): Yes. That's what we're doing now. And, well, one other thing about aliases they have to be changed before you submit it, is there maybe any way in the future that you could change the name of an alias and, you know, without un-submitting it first or, you know.

Right now I have some documents that have been submitted and we changed our naming convention, so to speak. If I would – it's nothing major but it's sort of interesting. You've got the alias function, it's sort of (graded) out once you've submitted it.

Kathy Schechter: Yes. That's correct. Because you have to have it in order to ask to be opened.

(Anthony Castillo): Oh, correct.

Kathy Schechter: You can change it at any time whether it's an un-submitted document or one that's been submitted and then unlocked. You can change the alias then too, but I'd hate to have a whole bunch of things opened and unlocked just to change an alias.

(Anthony Castillo): OK, all right.

Kathy Schechter: Please, questions and comments send it to the (e-task) reporting at epa.gov.

Operator: And your next question comes from the line of (Richard Pavla).

(Richard Pavla): Hi, this is (Rick). This looks like a very serial process, so if I do a partially completed form how do I get back to a specific section, or do I have to start at the beginning and squirrel through?

Kathy Schechter: No. Once you have gone from screen to screen it automatically saves or if you hit the save button it saves your document in progress.

(Richard Pavla): Right.

Kathy Schechter: So that means – that form and then go back into it you can use your navigator to go directly to that form. After that…

(Richard Pavla): Through (corporate) section of the form. OK.

Kathy Schechter: Yes, to that section of that form.

(Richard Pavla): Yes. OK. Perfect. Thank you.

Kathy Schechter: The thing will have already saved up to that point.

(Richard Pavla): Right. OK.

Kathy Schechter: But it's kind of nice having the save feature going from screen to screen…

(Richard Pavla): Oh, yes.

Kathy Schechter: If you're a (gamer) the rule of thumb is save early save often. So this is the way that saves your work in progress as you move along.

(Richard Pavla): And while you're on, just to elaborate on the other question about attachments. Currently we need to go through and use the (brass) function to establish a pathway for the attachments. Is that still going to be required or can we just – if I have an attachment in the file on my computer just copy and paste to put it into there.

Kathy Schechter: No. As you probably may have seen from (Casey's) demonstration it opens the last folder to which you had opened. So if you store everything in one folder and you go to attach a document it will open that folder.

(Richard Pavla): OK. That used to do that, so that's good. That's an improvement.

Kathy Schechter: Correct. Yes, the task – the client unfortunately kept going to the default folder.

(Richard Pavla): Oh, yes.

Kathy Schechter: Ever since then once you set the first attachment in a particular location the next time you will open it up to attach a document it should go to that same location.

(Richard Pavla): Great time saver, thank you.

Operator: And your next question comes from the line of (Alanni Greco).

(Alanni Greco): OK, hi. I have a couple of questions. And the first one is if I will be able to create a template, we have this limited amount of what types of chemicals that we import, so, you know, pretty much the forms and that information that's on there is similar to what we had, you know, previously submitted before.

Can we create a template for a certain type of a chemical, maybe A, B, C?

Kathy Schechter: Yes, in a way.

(Alanni Greco): Yes.

Kathy Schechter: Your template could be an XML. So, for example, for (to allow) everything that you can, unfortunately you cannot export attachments as a part of your XML. But you can fill out everything, export the XML and then you re-upload that XML as many times as you want. So kind of use the XML information as a template.

(Alanni Greco): OK. OK. And then – well, right now we are just an importer, we don't really manufacture anything. We import chemicals and the manufacture notifies me when the new substance is in the chemical we'll just, you know, they just tell me that, well, you have to file this, let's say, (LED).

So what we used to do, what we have been doing is that they create like the draft in that (e-task) and then they send it to me. I open it up here and then, you know, kind of finalize the paperwork and they submit it.

So in this new function of second the (AO) I was thinking that I should have signed them the manifesto as a second – am I correct on that though process?

Kathy Schechter: If you want (an assurance) demand, if you're going to have them create something for you they would technically be more of a primary agent/consultant.

(Alanni Greco): OK.

Kathy Schechter: So they would be submitting documents for you the (AO) to submit it to the agency.

(Alanni Greco): OK, then, but I am the one who is in the United States, so I will be the one who is actually (pinging) the submit button so it doesn't really matter then. Yes, go ahead.

Kathy Schechter: Leave it – and if you want them to create documents then they would called the second – not the (second area), they would be called primary agents as consultants.

(Alanni Greco): OK.

Kathy Schechter: On behalf of you they would create documents for you.

(Alanni Greco): OK. OK. I guess that can link to my first question that, you know, we can exchange the data through XML, correct?

Kathy Schechter: If you wanted to but if they were creating things under an account for which neither of you share that data then, yes, they would have to create the XML and send you the XML.

If you want them to create it under your company's profile then you would have to sign them up as your agency consultant and then you would be sharing a document online. And you have to make sure you pass along the task phrase…

(Alanni Greco): Right.

Kathy Schechter: Because whoever created the document has the ownership of the task phrases, so to speak.

(Alanni Greco): OK, good. All right. My third question is, so consolidated submissions, so it sounds like – but then one substance is that this newly created won't submit under one submission. And I guess my question is what would be the benefit and maybe some disadvantage over there. In other words it's great that we don't have to go through a different submission for (like 10) different substances.

But that in time if you have to look it up later on that would be more cumbersome to look it up one's substances when that was…

Kathy Schechter: (Slides), we did go over consolidation, and the one thing that I didn't add, which I might add before posting has to do with the inventory express services. In a consolidation you only get up to successes/

(Alanni Greco): OK.

Kathy Schechter: That's one limitation.

(Alanni Greco): OK.

Kathy Schechter: They have to be prior approved by our pre-notice coordinator which means that the substances have to be similar enough for EPA to OK the fact that they come in as a single submission.

(Alanni Greco): OK. All right.

Kathy Schechter: They have one user fee, which is good. They get different case numbers and they act like different substances, you know, with regards to (NOCs) and stuff like that.
The only other restriction is you have to use what we call Method 1 which is (CAS Inventory Expert Services) to obtain a name and or cast number if one is not available if you want one with a CAS number. That's the only difference.

For a submission that's not consolidated it's up to you whether you want to use (CAS Inventory Expert Services) or not. But for a consolidated you have to use (CAS Inventory Expert Services), unless it's a joint (or a) better support.

(Alanni Greco): Right. OK. Well thanks for the (good education).

Kathy Schechter: OK.

Operator: And your next question comes from line of (Rod Otte).

(Rod Otte): Yes, hi. Two questions. The first is, is there a live mock (TMN) that can be worked with without having been established as a consultant to somebody, and if so where do I get to it?

Kathy Schechter: It depends on what you mean by that. We are – actually I think we have on our website. It was PDF of the (PMN), so that somebody can look to see what information that we collect in the (PMN) form. They have to – the mark is not for submission or something like that on it.

Female: It's on the forms page I think.

Kathy Schechter: Yes.

(Rod Otte): And that's just – that's just the PDF print of the information pages. That's not something that I can practice with to make sure I understand how it's done.

Kathy Schechter: So technically the things that you create and you store are your own files in the, quote, "cloud" or the servers that you're logging into. So, technically you could log in as a primary (AO) for your own company and practice.

(Rod Otte): Got it. OK.

Kathy Schechter: So you do not have – (do) anything in the cloud. It's all there for you and you alone. It's the only one that gets submitted that it becomes a document that EPA recognizes.

(Rod Otte): Good enough, good answer. Thanks. And the second one is – so, assume – a couple of years ago with the – with the (e-task) compliance a (PMN) was submitted, completed and produced a (5E) consent order, which consent order continues to be alive and it requires testing.

So from the time we need to provide the information relevant to that file, for example, and the (initiation) of tests or the completion of tests. Now we've moved to the new system. How is that done?

Kathy Schechter: OK. Subsequent information beyond the (PMN) and outside of an amendment is done using the support forum. We still have the option for test data if you actually have submitted the study that you want to send in. And we have the option for what we call other correspondents which is, you know, for example quarterly reports. There's something if you – if you had reports that you have to submit to the agency, a recorder.

Female: Suspension.

Kathy Schechter: Yes, suspensions if you want – the only thing that we do not allow to come through as the support which would be the signed consent order that still has to be – (when in) signature paper copy.

(Rod Otte): Sure. OK. So basically using the support form you could reach back in time to something pretty old and connect the used system to it using the CAS number and so forth.

Kathy Schechter: Correct, correct.

(Rod Otte): OK. And actually I did have a third very quick one, suspension has come up a few times. Under the new system is there still the old 15 day suspension request?

Kathy Schechter: Yes.

Female: Yes. Yes. Nothing's changed.

Kathy Schechter: Nothing's changed. We just added in the dropdown option of a submission type for the support.

We tried to tailor it to what we received on our end and we actually have a type of document here called – it's called suspension, so we've added that as a dropdown option. So if that's the only thing that you're going to do, let's say a 30 day suspension then you would choose a support document form. And then as your support type you'd choose suspension request.

(Rod Otte): Got it. But for the 15 day it will be the same as it used to be.

Kathy Schechter: Yes.

(Rod Otte): All right. Thanks.

Operator: And your next question comes from the line of (Marina Diller).

(Marina Diller): Oh, hi, sorry. I thought my phone was not working because I pressed it sometime ago.

One of my questions was already answered by (Kacie) regarding the size of the attachments. I just wanted to inquire more information regarding unknown sites.

Kathy Schechter: OK. Technically within the software when we saw it, it had sites controlled by others. You can choose the fact that you don't have any site-specific information, but you do have an estimate of the number of unknown sites, so you can enter a value there.

We also have text boxes where you can, under the operation description describe anything more additional that you want to explain about the unknown sites. For example, they might be certain used sectors or something like that. And always there's attachment options.

If, you know, five unknown sites doesn't explain enough about what you want to say you can always add attachments that gives more detail.

Female: Just remember specific sites can do better outcome with, you know, it takes worst case when…

Kathy Schechter: Yes, when you do (it on everyone).

Female: Yes.

(Marina Diller): OK, thank you.

Kathy Schechter: Sure.

Operator: And your next…

Kathy Schechter: Three unknown sites but you know that they're in the state of Texas, well, then give us that information.

Operator: And your next question comes from the line of (Imogene Trimble).

Kathy Schechter: Hi, (Imogene).

(Imogene Trimble): Yes, hello. Just a couple on the sites controlled by others is it like the – your own sites in the dropdown you have to have the sites loaded in from (CDX)?

Kathy Schechter: Correct. In the managed facilities of (CDX) you would include any potential manufacturing sites, processing sites and used sites, whether they're your sites or somebody else's. It's just a Rolodex of sites, it's not – technically tailoring you to that specific site, so.

(Imogene Trimble): So every time you do it in your (PMN) you may have to, you know, there's a good chance there's new sites controlled by others, so you have to go in and load those first before you start the (PMN) form.

Kathy Schechter: Correct. And then if you have subsequent (PMNs) that use that same site it ought to be there.

(Imogene Trimble): Yes, OK. And can you – so the letter of support submitter, those people can be outside the US, but they still have to be registered with (CB) in the (CDX) system?

Kathy Schechter: Correct. They have to be registered as secondary authorized officials.

(Imogene Trimble): OK.

Kathy Schechter: At least one person from that other submitting company.

(Imogene Trimble): OK. And one more question, in the attachment, especially in the physical properties you can link an attachment to a specific (visible) property, can you link one attachment to more than one (visible) property…

Kathy Schechter: Yes.

(Imogene Trimble): Often a number of (visible) properties are done in one report.

Kathy Schechter: Just to attach it will give you all the checkboxes of the things that you said that you've reported as being – probably have information on, and so, when you go to attach you can select one or more.

(Imogene Trimble): OK, great. Thank you very much.

Operator: And your next question comes from the line of (Claire Scott).

(Claire Scott): I can't remember if I'm muted, can you hear me?

Kathy Schechter: Yes we can.

(Claire Scott): OK. So can I attach a video document? It's a Microsoft Office product. But I didn't see that listed in the document extensions.

Kathy Schechter: No. It's not.

(Claire Scott): OK. So I have to make that a PDF or something.

Kathy Schechter: Please.

(Claire Scott): OK. Two more questions.

Kathy Schechter: Sure.

On this consolidated (TMN) or (LVE), so you have to use the method one, the inventory expert service report, but what if you can find the chemical in (Sci Finder) which is managed by CAS and that's where they put all the information, that's their database, you know.

Kathy Schechter: I know. Unfortunately you still have to use inventory expert services.

(Claire Scott): OK.

Kathy Schechter: Yes.

(Claire Scott): And last question, so from listening to somebody's just previous question it sounds like I will not be able to manually enter data on the site, it's going to have to be a site I put in my (CDX) registration.

Kathy Schechter: Correct.

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

Kathy Schechter: At the add site the only option you have is to pick from a dropdown list. So you first make sure that anything that you will potentially be uploading into a (PMN) form and then a C form, a biotech form or a bona-fide form.

Any time where you're going to add a site location make sure you have it in your registration managed facilities.

Operator: And there are no more audio questions.

Kathy Schechter: OK.

Operator: And we do have a question again from (Claire Scott).

(Claire Scott): Yes, I'm sorry I was in – I guess I hit mute again. So does that mean that I also cannot manually type in my primary authorized official information?

Kathy Schechter: You won't even see the boxes for the primary authorized official.

(Claire Scott): OK.

Kathy Schechter: They only come up when you hit the submit button and it automatically populates with the person who is pushing the button.

(Claire Scott): Oh, oh, and will I see – what about the technical contact because I always put myself down as the technical contact.

Kathy Schechter: Technical contact you have the option to download. If you are the one filling out it will populate with your information from (CDX).

(Claire Scott): But I would be able to manually enter somebody else's…

Kathy Schechter: Correct.

(Claire Scott): OK.

Kathy Schechter: The option to do both.

(Claire Scott): OK. Thank you.

Operator: And we did have some additional questions that come in. The next question is from (Amanda Price).

(Amanda Price): Hi. I have a question regarding amendments to (PMNs) that may have been submitted under the old software before, you know, January 19th of next year, and might still be under review.

In that case do you use a support forms to submit an amendment or do you have to try and upload the file into a new system and amend it by modifying.

Kathy Schechter: Yes. Anything that was created in the e-task of the client you use the support form to amend. If you go in you put in the (PMN) number it will check to see whether or not you submitted it using the (thin) client or the (thick) client.

If you use that and you submitted it via the (thin) client you won't be able to hit amendment. But if you…

(Amanda Price): OK.

Kathy Schechter: … and that you task a (thick) client you definitely need to use the support form and then select amend.

(Amanda Price): OK. Thank you.

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

(Elizabeth Becker): Yes, thank you. Can you hear me?

Kathy Schechter: Yes, we can.

(Elizabeth Becker): OK. Early in the presentation when on one of the slides it was being demonstrated how to upload an attachment. The attachments were called Doc 1, Doc 2, Doc 3, Doc 4.

And I thought (Kacie) said that we shouldn't use any CBI in the names of the CBI documents, is that true?

Kathy Schechter: I think it's the…

(Elizabeth Becker): I don't use CBI in the name of my (sanitized) document file…

Kathy Schechter: Yes. I think it's the description field that gets shared between the CBI and the (sanitized), so don't put any CBI in the description field.

So when you render your submission to PDF the CBI version will have the CBI file names and the descriptor and the (sanitized) version will have the sanitized file name and the same descriptor. So make sure that your descriptor doesn't have CBI in it.

(Elizabeth Becker): OK. Thank you very much.

Kathy Schechter: Always play around with it and see what it does. The more you play around with it the more you learn, right?

(Elizabeth Becker): Yes.

Operator: And there are no additional audio questions. And again I do apologize we have a question coming through (Beth Caruthers).

(Beth Caruthers): Hi, yes. I believe you mentioned earlier in the presentation that the technical contact must have a US address, is that the case?

Kathy Schechter: Yes. We do not call outside the United States.

(Beth Caruthers): OK. So if for example the submitter is a US-based organization but the person with the best technical expertise is based at a, say, Canadian branch, there's no capacity for that?

Kathy Schechter: It's ahead of the US telephone number, we're allowed to call it but we try to have it as a US contact when it's actually located in the US.

Female: I mean when you call them they can be something other than the technical contact.

Kathy Schechter: Exactly. It might be go between the technical expert and the submitting company that needs to be contacted. But, yes…

(Beth Caruthers): OK. It's the policy to not contact phone numbers from outside the US. OK. That's good to know. Thanks.

Kathy Schechter: I mean we've had some Canadian folks who are just above the border, you know, that – but they have a US phone number so you'd never know the difference.

Operator: And it appears that there are no additional audio questions.

Kathy Schechter: Yes. I think we'll go ahead and stop at this point in time. Please send any additional questions or comments to (e-task reporting). I think we did go through those and responded back to the persons who had questions before, so it is a very good vehicle to send in any questions.

And if there is anything that you would like to see, changes, enhancements, things to note please send it to (e-task reporting) at epa.gov. Thank you very much.

Operator: And this concludes today's conference call. You may now disconnect.

Kathy Schechter: Thank you.

END