2016 CDR Reporting Application Webinar

EPA

Moderator: Susan Sharkey
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OPERATOR: This is Conference #:   52534447

Good afternoon. Thank you for standing by and welcome to the 2016 Chemical Data Reporting Walkthrough conference call.

All lines have been placed on mute to prevent any background noise. After the speaker's remarks, there will be a question and answer session. If you would like to ask a question during that time, please press star then the number one on your telephone keypad. If you would like to withdraw your question, press the pound key.

Thank you. Mr. Chris Gardner, you may begin your conference.

Chris Gardner: Thank you, (Toni). Good afternoon, may name is Chris. I'm an environmental Protection Specialist in the Information Management Division within the office of Chemical Safety and Pollution Prevention.

I would like to begin by thanking you for participation today's Chemical Data Reporting Outreach session. Please note that if you're experiencing difficulties viewing the presentation, please ensure that your Adobe Add-ons are enabled as they're necessary to view the presentation.

During today's presentation, we'll provide a quick overview of the 2016 CDR reporting requirements. The purpose of today's outreach is provided – is to provide you the preview of the tool so we'll not be dwelling on the reporting

requirements to any extent or CDX registration. These subjects will be addressed in the future outreach.

We will – then we'll walk you through the reporting tool, show you how to upload XML files and how to make amendments to already submitted form used and provide you with information on the upcoming industry testing of the tool and then we will have a Q&A session at the end.

Susan Sharkey: My name is Susan Sharkey and I'm going to just walk you through the next three slides of the 2016 CDR requirements.

As Chris mentioned, the purpose of this webinar is not to dwell on the specific requirements themselves but to give you an overview of the reporting tool itself and some of the changes that we made since 2012 CDR.

So the reporting period begins June 1st and extends to September 30th of 2016. If you are a manufacturer, including an importer of the TSCA inventory list of chemical substance, you need to consider whether you need to report or not. And reporting is required for chemicals with production volumes of 25,000 pounds or greater at a sites or for certain selected substances that are subject to TSCA actions the production volume threshold of 2,500 pounds. And this is – unless the chemicals are otherwise exempt.

So very things that are really important to know is that reporting is site-specific, that means that for each site, you complete one reporting form called Form U and that one form has all of the chemicals that are required to be reported.

Reporting is – the reporting standard is known to or reasonably ascertainable by your company for all of the data. So this is a change from the past where we had different reporting standards for different types of information.

You can claim any of the information on the form as confidential business information as long as it meets the requirements for that claim. There are a couple of data elements where upfront substantiation is required and that's for the site and chemical identity, CBI claims and any processing and use CBI

claims. The electronic reporting form provides a way to do the upfront substantiation.

Looking in more detail at the specific reporting requirements, for the manufacturing related data, you provide – you identify what the chemical is that you're reporting and you report that by CAS number and chemical name. If it's a CBI chemical which means it's listed on the TSCA inventory of – the TSCA confidential inventories, you report by a session number and generic chemical name.

Those – all of that information is listed in our – SRS, the Substance Registry Services, which you can also go and access by going to www.epa.gov/srs.

For each of the chemical substances, you report the production volume for four different years. For the years 2012, 2013, 2014, you report your total production volume only. For 2015, you break that production volume down into domestically manufactured and imported production volumes. And then there is few other pieces of information that you report associated with the 2015 production volume.

When you're looking at whether or not your chemical substance needs to be reported, you look at each of the these years and if in any one of the years, in 2012 or 2013 or 2014 or 2015, you met either that 25,000 pounds threshold or the 2,500 pounds threshold, then you're required to report regardless of the production volume in the other years.

For the additional data elements for manufacturing related data and, again, these are reported only for the 2015 data, the number of workers that are reasonably likely to be exposed, the maximum conservation and indication of whether the chemical substance is being recycled, remanufactured, reprocessed, or reused the chemical physical form or forms and the percent production volume in each of the forms.

You also report processing and use information, again, related to the 2015 production volume only.

For the industrial processing and use, you report up to 10 unique combinations of industrial category, industrial section sector and functional use. When you combine, look at these three, it gives and – gives us an idea of an exposure scenario associated with that chemical. For each of those unique combinations, you provide the production volume, the number of reasonably likely to be exposed workers and the number of sites, and all of those are provided in ranges.

For chemical and – I mean, commercial and consumer use, you report up to 10 of the unique product categories. You identify whether it's a commercial or a consumer use, if it's in a product intended for use by children, the percent production volume, the maximum concentration, and again, the number of reasonably likely to be exposed commercial workers.

Chris Gardner: So to access the Form U, the first thing you would need to do would be to register with EPA Central Exchange. Registering with the Central Exchange, you need to register in your primary organization and then add each facility that you would be submitting a Form or a Form U4. You can also update your current registration because there would probably be many of you who are returning from previous reporting years and update your current site information.

Once you have your accounts complete and updated, then you will be able to access the CDR application to complete your Form U and again, that's one Form U per site and the application will provide step by step submission instructions.

(Erin): Thanks. And next, we'll just do a demo of CDR 2016 form.

So, first, when you log in, will be at the CDR home page, you'll enter in your CDX log in credentials, then you'll click the Log in button. And then it takes you to MyCDX page and you can click the CROMERR Authorized Official link for the chemical safety and pesticide programs, program and service.

And then it takes you to the Chemical Information Submission System page and you'll select TSCA Chemical Data Reporting CDR, from the dropdown menu and you can click the OK button. And then it takes you to the CDR

home page and you can click the Forms tab link. And then it takes you to the CDR Form U page.

And then just one note that the sites that are displayed are the sites that might be associated with your CDX user ID (inaudible). And so, in this page, you will click the site links for the site that you want to provide information for. And if you made any changes, like you added any recent, any new sites, you can click the Refresh Form U button to refresh the page with any newly added or remove sites. And then, you'll notice, at the top, you have some sort of like filter, dropdown menus so you can sort by reporting year. You can search for a site or you can search for a form by status, flip by default, the current reporting year will be displayed.

So, click the site link and then this is a new form. You'll see the Create Passphrase screen. So you'll enter a new passphrase and confirm that passphrase and click the Next button. And then just one note about passphrase, just let you remember it and you don't lose it because it can't be reset. It's not stored anywhere for security purposes, the passphrase basically serve to approve your form.

Chris Gardner: So if you do happen to lose you passphrase, you will lose your entire submission. You'll still be on your Form screen but you'll need to provide us information to reset your form and then you'll have to begin from scratch again.

Susan Sharkey: OK. So after you create your passphrase, click Next. And then, this takes you to the Section 1.A Parent Company Information page and so you can enter in the Dunn & Bradstreet number and then the county and parish value. And then, click the Next button. And then, this takes you to section 1.B Site Information page. You'll enter in the site CMB number and county and parish value and you can click the Next button.

And then just one note, based on commons that we've received, there have been some new features implemented into the CDR 2016 forms, including the option to sort chemical by date or time, which you can see as an option in the action bar in the button, in the action bar in then lower left-hand side of the

page. You can also search for a chemical using the dropdown menu that displays in the navigation entry. You also have the option to collect the navigation entry or expand it and then, chemicals are sorted by category number. OK.

Now, OK, so after you enter in your site information, you can click the Next button, and then this takes you to the Section 1.C Technical Contact Information page and you can enter in your technical contact information or you can click the Copy CDX Registration button to identify yourself as a technical contact.

Susan Sharkey: And Chris, the technical contacts, the technical is specific to a chemical, so if you have multiple chemicals at your site, you can have multiple technical contacts or you can have one technical contact for the whole site.

(Erin): And then after you're done entering one or more technical contacts, you can click the Next button. And then this takes you to the section 2.A Chemical Identification page and you can click the Search button to generate the Search SRS window and search for your chemicals.

So, on the Substance Registry Services window, you can enter in the category of the chemical or the CI Index name or others (inaudible) and click the Search button and then, you will select the radio button of the chemical search results that displayed and click the OK button. And then this populates your chemical, launch your Chemical Identification page and then, you click the Next button.

And then, that takes you to the section 2.B Manufacturing Information page. Feel enter in your manufacturing information and your 2015 production volume values and then one thing that we also add is that this newly way that CBI substantiation is done. So if you do mark something at CBI, what will happen is the pop-up window will generate and you will enter in the responses to your CBI substantiation questions. So you can enter in your responses, you can save them. If you want to change the answer, you just check the CBI checkbox again and it will bring up the responses you previously entered and you can edit anything. You can delete your responses, wish for all uncheck

your CBI substantiation so basically it would just be managed from the page where you originally report CBI.

And then, on the Manufacturing page, you'll report, you know, your physical form and your production volumes for the past 14 years and then, you can click the Next button.

So then, this takes you to the section 3.A Industrial Processing and Use page, and so you can enter any industrial processing and use information that's applicable or check the Not Applicable checkbox. Then you can click the Next button once you're done. And then this takes you to the section 3.B Consumer and Commercial Use page. So you can enter any consumer and commercial use information that's applicable or check the Not Applicable checkbox.

And we'll demonstrate this page in more detail in our live demo. We can show you how information is actually enters into these pages, which is through dropdown menus and they contain different values.

Now, like once you're done entering information, you click the Next button and so, you'll be taken to your CBI substantiation summary page.

So at this point, you can either – to validate your form, you can click the Submit icon in the bottom action bar to begin the process of submitting the form.

Chris Gardner: All right, you can also, if you need to add more than one chemical in the bottom left-hand corner, there are buttons to add additional chemicals or to join – joint chemicals and they'll create a new folder for each chemical.

(Erin): OK. Correct. And then for now, we'll just cover the submission process.

So after you click the Submit icon in the button action bar, this takes you to the Submitting Official Information page. So you will review the information that displays and then check the (inaudible) responsible certification statement checkbox and then click the Next button.

And then, so once your form validates, if you validate successfully, the application will start to create the PDF. If you do have errors in your form, then the Validation window pops-up with the errors within your form, you have to go back to your form and correct those before you can continue submission.

So once your PDF finishes generating then, the PDF displays on the Submission Process PDF Generation page, so you can click the View PDF button to either view the PDF or you can click the Continue button to continue the process of submitting.

It will ask you to continue, this takes you to the CROMERR Certification page so you can click the I Certify button once you reviewed the certification statement. And then, this takes you to the CROMERR Log in page. You can enter in the CDX password and then, click the Next button. And then, this takes you to the CROMERR Security Question screen and you'll enter the answer to the 2501 question that displays and then, you click the next button. And then, this takes you to the submit CDX page and then click the Confirm button. And then this takes you to the CROMERR Submission page and you'll click finish.

And so the next, we'll review the process of actually downloading your Copy of Record and extracting the XML file. So, once you do submit your form, you can navigate back to the Form page and if you want to download the copy of record, you click the Copy of Record icon like the green arrow icon displays in the Copy of Record column.

Chris Gardner: We recommend that you download and save your Copy of Record after every submission. CDX will only retain your last submission. So if you – you could unintentionally lost your first Copy of Record if you resubmit and – so we recommend that you save that off to your own system.

(Erin): OK.

(Off-mike)

(Erin):   And then after you click the Copy of Record icon, this takes you to the Enter Passphrase screen. So you'll enter the passphrase to the form and click the Next button. And then it takes you the CROMERR Log in page. So you'll enter in your CDX password and click the OK button. And then, this takes you the CROMERR Security Question screen so you'll enter the answer to the 2501 question that displays and click the OK button. And then, this takes you to a page where the Copy of Record generates and the Download Copy of Record page displays. So you'll click the green arrow icon to download and save the Copy of Record for record purposes.

And so then, once you have your Copy of Record, they'll be in a Zip file format so if you want to open the ZIP file, we can right-click and open with the WinZip and then, within your Zip file, you can extract all the files which will include your CDR XML file and the CDR PDF.

OK. And so next, review the process of uploading an XML file into the CDR form.

So, in your CDR form, you can click the Upload XML button that displays in the bottom left-hand side of the page. And then this takes you to the upload – displays the Upload XML page and then you can click the Upload XML File button, and then you will search for and select the XML file you want to upload into your form and click Open. And then, the XML is uploaded into your CDR form. It will process and then it will display a message, hopefully successful.

Chris Gardner: So, in the previous reporting period, some submitters purchased off the shell tools to assist with creating the XML files, if you do that, please be careful because a lot of those applications or a lot of the software will add their own software name into the XML file and that would cause an error when uploading. So we will be placing a drafter – a demonstration XML on the CDR website once they are ready. So if you do up to use XML or generate your own XML, please use the schema that we provide and ensure that your schema matches that schema exactly.

(Erin):   OK. All right, so next, we'll review the process of amending on a submitted CDR form. So in the CDR Form U page, once you've completed the form, if you want to amend it, you would click the lock icon that displays within the Action column, and this generates an amendment confirmation message window to confirm that you want to amend your form, you'll click the OK button. And then, so this takes you to the Enter Passphrase screen so you'll enter the passphrase to the form and click the next button. And so, then this will take you to the Amendment and Late Submission Explanation screen so you'll enter an explanation and you can click the Save or Next button.

So when a 2016 form, this page no longer displays until you amend – until you want to amend your form or when the reporting deadline passes.

So next, we'll actually go into a CDR 2016 form and kind of demonstrate the pages a little bit more.

OK. To log in, you would just enter the primary authorized official, to put the primary authorized official link, you'll access CDR, and click the OK button and click the Form tab or link. OK, we'll go ahead and we'll …

(Off-mike)

(Erin):   OK, So, on the CDR Form U page, you'll see that you have like the reporting year, dropdown menu, so you can, by default, 2016 forms will display. So, if you do want to access like 2012 form, you would select 2012 reporting in you dropdown menu or you can if you want to view all of your forms, you can select all reporting in your dropdown menu.

If you only want to look at specific site, you can search for that site. We can look for that site in the site dropdown menu and where if you only want to see form for the specific status, you can select that status instead of dropdown menu and then you can see the reporting year of the site in the reporting year column.

And again, you know, if you added a site and it doesn't show up, when you log in, you need to go to the bottom and click the Refresh Form List button and that will show any newly added sites or any sites that you've edited.

OK. So we'll just go ahead and start (CDR) form. You'll click the site link, site column header, this takes you to the Create Passphrase page so, again, you'll – if you want to create a passphrase that you remember, which is difficult people to guess. And then, you click the Next button. And then, it takes you to the Parent Company Information page and so you can enter in your DMB number, your county and parish value. Parent company information looks OK. And then if you click the Next button. This takes you to the Site Information page. In the Site Information page, you can also enter your site DMB number, or county and parish value

(Off-mike)

(Erin):   And then you can also – and then, you can enter in your technical contact information on the Technical Contact Information page, yes. Or you can copy your own CDX registration information and then …

Susan Sharkey: And then identify the default contact.

(Erin):   Yes. Make sure, you identify which one a default contact by checking the Default Contact checkbox. You can click the Next button.

If you do want to enter in more than one technical contact so you have multiple technical contacts, one for each chemical, you could, you know, select one that previously created. We can click Create New Contact and identify multiple technical contacts and each one of those displays within the company and site identification information folder.

Now, you can click the Next button, new and then, so in the Chemical Identification page, you can click the Search button to search for a chemical. You will enter in your search values and click the Search button. And then your chemical search results displays and you can select only view and you can click the Next button.

And then, it takes you to the Manufacturing Information page so you can enter in your manufacturing information. Again, if you are accessing …

(Off-mike)

(Erin):   … when you're accessing a CBI, you can enter in the response to your CBX substantiation questions on a pop-up window. You can enter in your 2015 production volume information, your physical form information and then your production volume for the past 14 years.

So then if you click Next, it takes you to the Industrial Processing and Use page and so we can enter in your industrial processing and use information you have so you would select the type of process and use value from this dropdown menu. You can mark the CBI if you want. You can select the value for sector, industrial function category. You can enter in the percentage production volume, the number of sites, and range and number of workers. You can enter in multiple categories and then click the Next button. And then, this takes you to the Consumer and Commercial Use page, and you can also select values for the product category from a dropdown menu, we can enter in – you can select the value for (inaudible) indicate whether, it will be consumer and commercial use, whether it's used in product intended for children, percent production volume, a concentration range and then the number of commercial workers reasonably likely to be exposed.

And then if you want, you can add a chemical then this will add another chemical folder within your navigation entry. And you can identify your second chemical on the Chemical Identification page and then you can sort by chemical name or date. So …

(Off-mike)

(Erin):   OK. So if you wanted to search for a chemical and you added a bunch of chemicals, you can click the dropdown menu that displays and you can type in your chemical you're looking for and kind of shift to that chemical folder. You can collapse your navigation tree or expand it. You can sort the chemicals but the date they were added and the name, this is very (flashy) because it's kind of already in order, I didn't pick a very good example, sorry.

If you add – if you want to identity your joint submissions, click the add joint submission folder. You can populate information for that there to identify

different contact and then, chemical identification and enter in the information there and you had your (unique) identify, you can pass on so they can create the joint form and then – or you can – you have the option to upload the XML also to the button.

Chris Gardner: If you do up – to use the XML upload, it will override everything that previously entered. So it's better to do the XML first and then edit the data.

(Erin): Right if you want to access, not only lose something, yes, that's correct. So …

(Off-mike)

Susan Sharkey: Can you explain the how to validate in the Save buttons work?

(Erin): Sure. So, when you're actually enter an information in your form, the form will actually save the information you've entered when you click the Previous or Next buttons it also validates. So if you do have, like an error, one of your pages like a little message will pop-up when you click Next. And it will tell you, you know, which fields you're missing and then if you put validates, basically the application will validate your form, you know, complete your missing values. And then also when you submit the submission process also validates your form. And then you can also put the Save icon in the button action bar, just save your enter form because global saves=.

But if you do just – if you do just click the navigation entry it doesn't save the information you've entered so be aware of that. So then, you know, it will just list the error messages that you have that you need to fix before you submit.

So these are actually links, so if you click on them, the application will take you to the page, you know, where the error message originates from. So this one, if I click the parent company, DMB number is required, (flipping you) this page, like, you know, like "Oh I didn't enter in a (inaudible) parent company, I should do that now. I need to do that now." You'll enter in – you'll fix the other errors and you can save or validates

(Off-mike)

(Erin): So we'll go back to the presentation.

Chris Gardner: So within your reporting application, there is actually a tab for resources and within those resources you can find links to the user guide, CDR reporting or web page and other resources. There's also resources outside, like the e-CDR web where you can submit questions for specific reporting requirements, the TSCA hotline or the – if you're having an issue with your setting up your CDX calendar, accessing something, you can contact the CDX help desk.

We will also be having additional outreach sessions for the CDR tool, those dates are TBD, and the slides that you have just seen and audio will be posted to the CDR website.

We are also going to be having industry testing of the CDR application. If you would like to participate in it, it will be occurring from November 2nd to November 20th.

We request that you send an e-mail to etsca@epa.gov and just simply, you know, say, we'd like to participate in the industry beta testing of the CDR application.

We also send you then information for TSCA accounts so you can log in some quick guidelines to use and if you do participate, and you find any errors or you have any comments, we request that you send those also to the eTSCA reporting tool – I'm sorry, website, so we can keep – the e-mail so we can keep track of them and potentially roll them in.

Susan Sharkey: So at this point, we'd like to open up to any questions that you might have.

Operator: As a reminder, if you would like to ask a question, please press star then the number one on your telephone keypad. We'll pause for just a moment to compile the Q&A roster.

And your first question comes from the line (John Howell).

(John Howell): Yes. Good afternoon. Thanks for they inform of seminar here on how to make the CDX submission of data work. Question is related perhaps more to

the data to be submitted rather than the process, so let me ask it to you, if I get a response.

Besides, the – and again, different from back in 2012 Industrial Process and Use is only required chemicals at the side of more than 100,000 pounds as I recall. The 2016, that's now down to 25, 000 pounds. Is that, you know, the processing and use data would apply only to chemicals which you manufacture on the site in the quantity of 25 000 pounds or more, or it does it apply also to other chemicals which you purchase from another supplier and use to blend with chemicals manufacture on your site in your products.

Again, so the question is, does the processing and use information which gives a 25 000 pounds apply only to things that you make it on site or to other materials that you bring in on site?

Susan Sharkey: Thank you very much for that question. I – this webinar really is focused on the e-reporting tool. I'm going to go ahead and answer but I'm asking everybody else to please if you have questions that have to be with the reporting requirements themselves, please contact us at the ecdrweb@epa.gov e-mail address, and we will get your responses.

Back, we'll have a future webinar where we get more into details of the reporting requirements as well. And for the question of whether you only report on chemicals that you manufacture including import, you do not report on chemicals that you purchase and use without any manufacturer of a chemical substance.

(John Howell):   Thank you.

Operator: Your next question comes from the line of (Julie Burns).

(Julie Burns):   Hi. My question has to do with the authorized officials, the only ones that can start the CDR report, the Form U or can a support for – primary support to the forms?

Chris Gardner: An authorized official was needed to start and submit the form. So at the – you need to have your authorized official begin the form and then to assign a

supports to that form. Once that's done, the support can edit, add and do whatever for the form and fill it out and then authorized official would need to come back in and actually submit it.

(Julie Burns):   OK. Can you tell us when you're going to have the XMLO form ready on the web?

Susan Sharkey: It will be in early 2016.

(Julie Burns):   OK.

Susan Sharkey: We don't have an exact date.

(Julie Burns):   Thank you.

Operator: Again, if you would like to ask a question, please press star then the number one on your telephone keypad. That is star one to ask a question.

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

(Elizabeth Becker):   Yes, thank you. My question is about passphrase. And I also am learning about PMN submissions and passphrases. So when you have a passphrase for your Form U, do you need a different one for each site that you're submitting?

Chris Gardner: No, you can reuse your passphrase for any submissions. And that's actually across submission types also. You just want to make sure that …

(Elizabeth Becker):   OK.

Chris Gardner: … once – yes, you keep that in a very secure place.

(Elizabeth Becker):   Yes. But then, I mean if you enter your passphrase, wouldn't you then get a multiple of forms that you get the sort through and pick out if you were searching by passphrase for a form that you've been working on.

Chris Gardner: You don't search by passphrase per form. When you access a form, you'll be asked for the passphrase but you can not search by the passphrase.

(Elizabeth Becker):   But you access the form first and then …

Chris Gardner: Yes.

(Elizabeth Becker):   … enter the pass – OK, great. Thank you. That helps.

Operator: Your next question comes from the line of (Althea Obrador).

(Althea Dorazek): (Althea Dorazek) here and my question is, will it be possible to populate or even start submitting the form use before kind of June of 1st before the start of the reporting period?

Susan Sharkey: At this point, the answer to that is no. Our plan is to allow submissions beginning June 1st.

(Althea Dorazek): What about populating?

Susan Sharkey: That is under consideration. Let me ask you back, how far before the reporting period would you be interested in being able to access the reporting tools.

(Althea Dorazek): Anytime after let's say February.

Susan Sharkey: So, we are planning on providing access to it before the reporting period. We just don't have an exact date yet.

(Althea Dorazek): OK.

Susan Sharkey: And of the things to keep in mind is because we – if you have all – once you submit – excuse me. Once you submit a form then, we have the information from the form and you can get access to your XML but if you start answering the information and forget the passphrase then you will have to start over. So just keep that in mind as you think about when you start filling out the form.

(Althea Dorazek): Sure. But you will provide communication as when the tool would be available for populating and even submitting earlier than June?

Susan Sharkey: Yes, we will.

(Althea Dorazek): OK. Thank you.

Operator: Your next question comes from the line (Jenny Soak).

(Jenny Soak): Good afternoon. I have a question regarding – a couple of questions, the first is with respect to the XML uploads. If the upload is unsuccessful, well the – would the software, the program tell us where the error is or do we need to go find out ourselves?

Chris Gardner: You'll actually need to find that yourself. The system can't do a comparison between your XML and its XML.

(Jenny Soak): OK. It can't even pinpoint of area or chemical? No?

Chris Gardner: No.

(Jenny Soak): No. OK, disappointing but thank you for the answer. Couple other questions with regards to once you're in the system itself, the e-CDR and you need to search for a chemical in your report, you showed us that you can search by chemical name, can you also search by chemical CAS number?

Chris Gardner: Not at this time.

(Jenny Soak): OK. And is there way that you could display CAS numbers in that left-hand column instead of chemical names?

Chris Gardner: Yes, we can probably do that.

(Jenny Soak): That would be very helpful. There are many chemical names that are same – they're super long and they're the same, you know, to the very end of the name. And so only having the name to search by or to view on that left-hand pane would be – it can be problematic. So if we can display CAS numbers in that left-hand pane instead of chemical names that would be incredibly helpful.

Chris Gardner: There is also, just to let you know, on each chemical page, there is a chemical alias field, where you can enter any text you would like forth to describe that

chemical. So if you entered – I don't know, one in that field, you would see one as the folder name for that chemical.

(Jenny Soak):   OK. I think I really just need CAS number as a folder name and that would be very helpful.

Chris Gardner: Thank you. We'll note that.

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

(John Chen):   Hi. I have a few questions. One is I've saw that Google Chrome, it looks like Google Chrome was being used for the live demo. Is that kind of what you recommend or, you know, is there like internet browser you recommend or, you know, one over the other like, Internet Explorer, anything like that?

Chris Gardner: I don't think we won over another. The tool is accessible through Internet Explorer, Chrome, Firefox so you can – you should be able to use any browser you have without problem.

(John Chen):   OK. And my last question is, I know you can upload XML and you can probably modify the responses using the web form, once you modified, is there a way to download that information as XML the other way?

Chris Gardner: No. The XML is generated during the Chrome error submission process, so you'd have to actually submit your Chrome error and then you would be able to gather the updated XML as a copy of record.

(John Chen):   After submission, you can only the XM. OK.

Chris Gardner: Yes. Yes.

(John Chen):   All right. Thank you.

Operator: Your next question comes from the line of (Jessica Macy).

(Jessica Macy):   Good afternoon. I heard another question about when the XML would be available and it was said early 2016. I was wondering, my first part of the question is, it's not just the XML schema definition or is that a sample XML?

Chris Gardner: We might be able to produce both.

(Jessica Macy):   Because my follow up question is, is there any way based off of the live demo that we could get a sample XML, that way, we could use that for reference.

Chris Gardner: Considering we still have additional testing to do, if we provided an XML at this point, it could be updated several times. So, if you start configuring your systems to it as is there maybe chances in the future, you'd have to keep reconfiguring which is why we'd like to hold off pushing out an XML schema until we have a finalized version.

(Jessica Macy):   OK. But it is possible that in 2016, we could get a sample XML and an (XSD)?

Chris Gardner: Yes.

(Jessica Macy):   All right. OK. Thank you.

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

(Claire Scott):   Hi. A couple of questions, passphrase, you know, I supposed to have any special characters, if you start typing in special characters, will it just ignore them or will it gives you an error message?

Chris Gardner: It will provide an error message.

(Erin):   Spaces are OK.

Chris Gardner: Spaces are OK.

(Claire Scott):   Spaces are OK. OK. Also, this is kind of a general question but you know when we fill out ePMN forms and LVE forms, we use kilograms. Are we ever going to migrate to kilograms for CDR?

Susan Sharkey: I wouldn't ever say never. Right now, the regulation calls for reporting in pound. So unless we do regulatory change, we would prefer only having, not allowing the choice between pounds and kilograms because that allows a

chance for a mistake to be made by not selecting, you know, having to choose between the two and …

(Claire Scott): But require kilograms for the PMNs.

Susan Sharkey: It's something that we will consider for the next time we do rule making.

(Claire Scott): OK. All right. Let's see. So, in your navigation in the system when you were filling up the U form, you used the navigation entry on the left-hand side, can you also use the back and forward buttons that are up at the left-hand corner?

(Erin): I wouldn't recommend using the back and like the previous buttons in the browser, I would just use the previous and the next buttons with in the application, that way, you know, you make sure you're saving, you're not enclosing anything.

(Claire Scott): OK.

(Erin): Yes.

(Claire Scott): Sorry for all the questions but this would be my last. So, when you save the form like you're in the middle of the form and you have to get out of it for whatever reason and you saved it to come back to it later. Will it automatically check the form and let you know what is incomplete at that time?

(Erin): No. Just – you can just save it and that's just a global save, it doesn't validate. If you want to know what's wrong with it before you submit just put validate, but

(Claire Scott): OK.

(Erin): … save your – (save) so that it doesn't identify any errors that are within your form.

(Claire Scott): OK. Thank you.

(Erin): Your next question comes from the line of (Lawrence Field).

(Lawrence Field): Hi. If you triggered reporting for a chemical substance because of either your 2014 or your 2013 production but your 2015 production, your total production for 2015 happens to be zero, would you enter zero for 2015 and then click N/A for the rest of the form?

Susan Sharkey: Yes.

(Lawrence Field): OK. So, it would allow an N/A for the rest of part 2B like where it ask for you know, your concentration and stuff like that?

Susan Sharkey: That is one thing to double check – yes, OK. Do have a consensus that yes, here are the – when reporting tool is configured, it will allow you to do that.

(Lawrence Field): OK.

Susan Sharkey: So if the production volume for 2015 is zero, then it will allow you to identify that everything else is not applicable.

(Lawrence Field): OK. Thank you.

Operator: Your next question comes from the line of (Susan Maleti).

(Susan Maleti):   Thank you. I just want to verify in the alias part of the naming of the chemical. You can use a CAS number for the alias, is that correct?

Chris Gardner: Yes. That's a just the open field, so whatever you want to put in there, you can put in there.

(Susan Maleti):   And then you can search on the alias?

Chris Gardner: Yes.

(Susan Maleti):   OK. Thank you.

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

(John Gabranski): Hi, this is (John Gabranski). My question has already been answered. Thank you.

Operator: Your next question comes from the line of (Linda Century).

(Linda Century): Hello. Thank you. My question is, can the technical contact be located outside of the United States?

Chris Gardner: Yes. The technical contact can be outside of the U.S.

(Linda Century): OK. So, when it's asking for a dropdown for state and say, I'm in some in Canada, I won't be able to fill in the state that won't be missing data?

(Erin):   I mean we can make it disabled if you select something that's none U.S. or we can have the validation not check if it's a non-U.S. country.

(Linda Century): OK. Thank you.

Operator: Your next question comes from the line of (Imogen Treble).

(Imogen Treble): Yes. Several of my questions have been answered but I guess I would just like to reiterate, it would be nice to be able to have the CAS number automatically put in as the folder name if possible. And then, the other question I had was you showed that the substantiation comes as a pop-up window, so when you fill that and you get out of that pop-up, do you go back to the page that you were on previously?

Chris Gardner: Yes. It actually never leaves the page. The pop-up window appears in front of it.

(Imogen Trover): OK. That's a great improvement over the last time. Thank you.

Operator: Your next question comes from the line (Robby Ganti).

(Robby Ganti):   Yes, hi, good afternoon. Quick question on the XML again, at some point, I guess we will be getting some sort of a documentation that would guide us to how to do all these, the loading and all that. And I think someone talked about (XCD) and the XML data format. So, will you be providing the once you finalize everything in documentation so we can give it our I.T. groups?

Chris Gardner: Well, we have some use for the XML but we aren't going to – we can't provide anything that tells your technical group how to set up your internal systems to generate the XML.

(Robby Ganti):   But do we have something on the structure how we can load it?

Chris Gardner: Yes. Well, we will provide a sample XML.

(Robby Ganti):   OK.

Chris Gardner: So, yes, to copy and to match your system.

(Robby Ganti):   OK. That's a big one. Thank you.

Operator: Your next question comes from the line of (Cathy Martin).

(Cathy Martin):   Sorry, I'd muted my phone. I guess I have two questions, one is around the preparation of the form and when you indicated that the authorized official needs to initiate it, do they initiate per chemical, or are they just initiating, starting a form kind of for the facility if they say that site is going to report and then the support person can enter the chemical names?

Chris Gardner: They need – they initiate the form, not by chemical.

Susan Sharkey: Yes, for the site.

(Cathy Martin):   Not by chemical, OK.

Chris Gardner: Yes, for the site.

(Cathy Martin):   OK. And then I've e-mailed you guys too, but I'm wondering about the reporting – the detailed reporting forms and instructions because I've – there's a website that would indicate 2016 instructions but there's actually no instruction document. There's a couple of other documents.

Susan Sharkey: Right.

(Cathy Martin):   Are we going to get a big book likely to have (like) 20 files?

Susan Sharkey: Yes, yes, you will. Right now, what we've done is, the '16 guidance set is on the website. We have a series of fact sheets that highlight the changes from 2012 to 2016 reporting.

A lot of the reporting requirements have not changed, so we do still have the 2012 reporting guidance available. And if you look at those two documents together, that will help you think about the reporting for 2016. But we will be updating all of the FAQs, the instructions manual, and we'll be posting a variety of additional fact sheets over the next several months.

(Cathy Martin):   OK. So like those – the codes that you use in reporting, I don't know what they're all to – I don't have them all at my fingertips, but like industrial function category code and all these things, updates, are you changing any of those to add new choices, or is it going to remain the same?

Susan Sharkey: None of those have been changed.

(Cathy Martin):   OK. All right, thank you.

Operator: Your next question comes from the line of (Howard Freeman).

(Howard Freeman):   Yes, good afternoon. I was – part of my question's been answered, but can you give a quick overview of what's changed since the 2012 CDR?

Susan Sharkey: Yes. There's basically two things that have changed. One is the reporting volume. The threshold of – for 2012, we had 100,000 pounds threshold. There is – that has now been dropped to 25,000 pounds which applies for all of the information with the exception of chemicals that have been – that has – or subject to another TSCA action. And for those chemicals, the reporting threshold is 2,500 pounds. So that's one change.

The second change is that you are reporting for previous – the total production volume for the previous years since the last reporting. So you're reporting not only for 2015 but also the production volume for 2014, 2013 and 2012. And for those three years, it's production volume only.

However, the – when you identify whether or not you're going to need to report, you look at each of those years, and if in any one of those four years, you exceed either the 25,000 pounds or that 2,500 pounds, whichever is applicable, then you've triggered reporting for that chemical.

(Howard Freeman):   OK, thank you.

Operator: Your next question comes from the line of (Rosalie Sovaldi).

(Rosalie Suvaldi): OK, hello. Yes, I had a question on the XML. It's only the A.O. going to have the privilege to be able to do that, or is that something the support registrant will be able to do?

Chris Gardner: Do you mean the XML or download the XML, the copy of record?

(Rosalie Suvaldi): Both.

Chris Gardner: I believe if you're assigned to the submission, I believe, and I'm not – we can always get back to you. I believe that if you – if a support is assigned to the submission, they can download the copy of record and they can upload it if they have a copy of it.

Susan Sharkey: No.

Chris Gardner: Oh, they can't – oh, I'm sorry, I apologize. I was mistaken on that. OK.

Susan Sharkey: OK. So the support person, they can't download the copy of record. What they can do is they can edit it and I think they can upload the XML, but the only person who can download the copy of record in the XML is the primary authorized official.

(Rosalie Suvaldi): OK, but the support registrant would be able to upload the XML?

Susan Sharkey: Correct.

(Rosalie Suvaldi): OK. I have another question. You know – well, two more questions. So I think I heard that the CDX will only keep the last submitted CDR. So when the Form U for 2016 is created, the 2012 will – what happens to that?

Susan Sharkey: No, the 2012 is the 2012 submission so that will stay. When we – we're talking about changes, amendments to this particular submission. So in 2016, if you hit Submit and submit your form and then the next day, make a change to it and submit again, we will overwrite your first submission, the first of the 2016 submissions. Your 2012 submission, we are retaining. Does that answer your question?

(Rosalie Suvaldi): All right. I think so. So the 2012 submission will be accessible, for example, in the future, you can make an amendment if something needs to be amended.

Chris Gardner: Yes, you …

(Rosalie Suvaldi): For 2012.

Chris Gardner: You'll have a separate Form U for your 2012 submissions and your 2016 submissions and any submissions.

(Rosalie Suvaldi): OK.

Chris Gardner: And the overwrite that happens for the copy of record is by site by year.

(Rosalie Suvaldi): OK, I think I understand that. All right. So then one of the other questions I had was about, you know, the pass phrase issue. And if you forget that, you know, you indicated that there would be some sort of reset process that somebody would have to go through in order – you know, I guess I'm looking to see if there's guidance available on that or some good instructions on what happens when you do forget your pass phrase because we're not able to find any – anything yet on the website for that situation.

Chris Gardner: Yes, we can put together some guidance for that.

(Rosalie Suvaldi): Yes, I think that's really – would be really helpful if that was made available for folks to – you know, who just don't have the pass phrase anymore and – yes.

Chris Gardner: Yes, we can …

(Rosalie Suvaldi): And what happens and what the options are.

Chris Gardner: Yes, we …

(Rosalie Suvaldi): And one of the proposals I had too is, I understand that if you do forget your pass phrase and you can't access, you know, and you have to go through a reset process and you have to start all over again and, presumably, this would be like for a 2012 amendment, what – I mean, rather than – I mean it does sound like EPA, they'll have access to that information.

It's just that, you know, we – and if we had access to that information from a PDF standpoint, it almost seems like there could be another option where, if an amendment needed to be made or some edit needed to be made to a form or CDR, that maybe a written or an extra field or application in CDX could be made available to make a specific amendment as a work around rather than having to restart and/or lose, you know, information.

You know, that's assuming that a site would have maintained their PDF information and could do that.

Chris Gardner: Yes, and that's kind of why we recommend that you – after you submitted, you download that copy of record because then if something does happen, you'll have the XML file and PDF, so you could just go back and upload that XML and you would have the last submission that you made. So then you'd only have to change the one or the two or whatever – however (many of the) elements and then resubmit.

(Rosalie Suvaldi): Oh, well, now that's interesting. So if you have that XML download, are you saying then that that pass phrase is somehow encrypted in there and that it would – if we …

Chris Gardner: No, it's what – I'm sorry, I'll walk you through the process. So if you lose your pass phrase, what needs to happen is we actually will reset your site. What that would do – it means that you would no longer be able to access that Form U, your original Form U. You would see a new site that you would have to begin your new Form U on for, say, the 2012 reporting period. You'd have to repopulate from scratch.

However, if you had downloaded your copy of record, then you could upload that XML and basically have all the information already populated.

(Rosalie Suvaldi): I see, OK. OK, that's a good advantage. OK. And one last question then on the pass phrase, so for 2016, when we start a new Form You, is that going to be new pass phrase, or would you – I mean it would be a new pass phrase, or would you use the same pass phrase as before in 2012?

Chris Gardner: That's absolutely up to you.

(Rosalie Suvaldi): OK, so we could use whatever was used in the past as well for the 2016. OK. All right, thank you very much.

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

(John Kowalsky): Yes, good afternoon. I have two questions, the first of which has already been answered in part. But to clarify, will there be printable – a printable instruction manual available, or will that be available only within the reporting tool itself?

Susan Sharkey: There will be a printable instruction manual available. It will be on a site …

(John Kowalsky): But …

Susan Sharkey: … at epa.gov/cdr.

(John Kowalsky): But it's not available as yet?

Susan Sharkey: It is not.

(John Kowalsky): OK. And then – thank you – my second question is, will EPA be providing a list of chemicals subject to the 2,500 pound reporting threshold, not eligible for certain full or partial exceptions or – and not eligible for the small manufacturer exemption?

Susan Sharkey: Yes. One of the fact sheets that is currently on the website provides some additional information about these particular chemicals, and we will be

providing access to a comprehensive list prior to the beginning of the submission period. It's – the way the regulation is written, it affects any chemicals that are subject as of June 1, 2016.

So if there's a chemical, say, that has a SNUR on it that is sun setting in March, that, by time we get to June, that chemical is no longer subject to a TSCA action and therefore would fall under the 25,000 pound threshold instead of 2,500. So because of that, we're not able to provide the full list until right before the submission period.

(John Kowalski): OK. Thank you.

Operator: Your next question comes from the line of (Mary Marerro).

(Mary Marerro): Thank you all for presenting today. I appreciate the early update and information. I would – my first question is about the 2,500 pound threshold. I think, based on the last response, there's nothing in the system that's going to identify a chemical at the lower threshold, meaning in the e-CDR, there'll be no automatic knowledge from that tool that it is subject to the lower threshold. Is that correct?

Chris Gardner: Well, you didn't see it in the reporting tool but when you do your search in SRS, the system will respond and let you know if you potentially are at reporting – a lower reporting threshold. There will be a message that pops up once you enter your chemical to provide you with more information.

(Mary Marerro): OK, OK. Great, great. And I wanted to kind of to give, I guess, maybe a third plug for using the CAS number as the main identifier. I'd helped gather some of the industry input on CDR and that was one of the most common and main requests. Some companies have over 200 substances at one site and renaming all of them using the alias is pretty significant. And I think most people who actually do the reporting tend to focus on that number versus the chemical name. So I just wanted to give another plug for that.

Susan Sharkey: OK, thank you, (Mary).

(Mary Marerro):   Yes. And then one more piece, I think I heard you say that there's no – when we use the validation tool, there's going to be nothing to tell us where if we happen to make a mistake or an error. One of the things I remember from the last time is we couldn't differentiate between our own error and, like, the system just wasn't operating properly at that moment.

Is there going to be any way to help us understand rather than trying to call in …

Chris Gardner: The way …

(Mary Marerro):   … to find out if there's a system issue versus our own validation issue or own system problem?

Chris Gardner: Well, when you do – when – you need to make sure your pop-up blocker is not on because when you validate, the system will actually produce a pop-up window listing any validation errors you have, and each link or each validation error will actually be a link to the page where the error is. So if …

(Mary Marerro):   Oh, OK, OK …

Chris Gardner: So if you …

(Mary Marerro):   … so that's different. That's different.

Susan Sharkey: I think the earlier comment was the question about the XML and identifying if the XML upload fails. Identifying …

(Mary Marerro):   Oh, yes, it was, it was. You're right. You're right. And that was another area where we had a problem, telling the difference between the e-CDR not functioning and our own problem.

Susan Sharkey: OK.

(Erin):   This is (Erin). The application will be like – would be a lot bigger. It would like a no pointer. It'll – it's pretty obvious. There's a like a huge red circle with like a red exclamation point, and that means that something is wrong in the TSCA environment. You can take screen shot of that and send it to us.

(Mary Marerro): OK.

(Erin): A validation error like something wrong with like a value or content within your form will show up with like a smaller error message, you know, a little red box either on the page if you're using the Next or the – and the Previous buttons or within the separate validation pop-up window, so.

(Mary Marerro): OK.

(Erin): Pretty – I think it's pretty clear.

(Mary Marerro): And will we be using – for the pilot, if we volunteer, is the schema used going to be part of that?

Chris Gardner: A bigger question.

Susan Sharkey: We …

(Mary Marerro): I'm going to hope yes.

Susan Sharkey: Yes. So the text environment is a non-CBI environment. Is that true?

Chris Gardner: Yes.

Female: Yes.

Susan Sharkey: So that's one of the problems with, like, using your past XML to be able to upload into it.

Chris Gardner: Yes, you could potentially create a submission, upload your XML – or download your XML, delete some chemicals and re-upload an XML to see if it's catching everything.

(Mary Marerro): OK.

Chris Gardner: But I don't think we are going to have any pre-made XMLs for upload.

(Mary Marerro): OK. So we would have to kind of to come up with our own to be able to try that.

Chris Gardner: Yes, but you could – so if you will – if you did – during testing, if you went through and, say, created a Form U with two chemicals, you could then go in, copy – you know, submit it, create your copy of record, download your copy of record that contains the XML, go back in to your submission, delete those two chemicals and upload the XML, and they – the two chemicals should repopulate.

(Mary Marerro): OK.

Operator: Your next – Admin, your next questions comes from the line of (Carol Coleman).

(Carol Coleman): I believe all my questions have been answered, but thank you very much for the time and the information today.

Chris Gardner: You're welcome.

Operator: Your next question comes from the line of (Betty Duncan).

(Betty Duncan): Yes, hello. My question has to do with, is it possible – if your 2016 report for the site has no change except for the production volume and then the addition of the previous three years, if there's no other change such as downstream use information, worker exposure, there's no way to really to be able to use that information and pull it up into a 2016 report? Is that correct, we have to rebuild from scratch?

Chris Gardner: Well, what you should be able to do would be to download or use your 2012 XML files from your copy of record and upload that, and that would pre-populate the matching fields.

(Betty Duncan): And then just go in and …

Chris Gardner: You make your …

(Betty Duncan): … add the additional parts?

Chris Gardner: Yes.

(Betty Duncan):   OK, all right. Thank you.

Susan Sharkey: Yes. And if you do that, make sure that that's the first thing that you do because if you previously entered any information into the 2016, it will get overwritten.

(Betty Duncan):   Excellent. Thank you.

Operator: Your next question comes from the line of (Fred Mirashi).

(Fred Mirashi):   Yes. I was wondering if you could, you know, spend maybe – walk me through the sequence of steps for assigning the technical contact or support contact.

Susan Sharkey: Sure. We can …

Chris Gardner: Yes. Hold on one minute, please, so we can pull up the …

                    (Off-mike)

Susan Sharkey: OK.

(Erin):   So can you see the screen?

(Fred Mirashi):   Yes, I can. Thank you.

(Erin):   Sure. So when you log in, you would click on the User Management tab or link and then, actually, you would select the reporting year of the site that you want to assign from the reporting year drop down menu. And once you select that, that enables the site drop down menu. So you'll select a site that you want to assign. And then that will display, you know, your support users on the unassigned kind of field, and then you'll select the support or supports you want to assign to that form, and then you'll click the Add link and that moves them to the assigned field set.

(Fred Mirashi):   So the support people have already gone through and signed up …

(Erin):   Yes.

(Fred Mirashi):   … so their name is there for that site already?

(Erin):   Right. When the support person signs up, they'll – what they'll have to do is
                      they'll have to identify you as their primary authorized official and they'll also
                      have to register for the same organization.

(Fred Mirashi):   OK.

(Erin):   And, you know, you want to do that by organization I.D., just to make sure.
                      And then, you know, if you do that correctly, then the support name will show
                      up on this management page.

(Fred Mirashi):   Excellent, OK. OK.

(Erin):   And then …

Chris Gardner: Just real quick, so I – you're talking about a support like someone to go in and
                      add data, not a technical support like someone just to call and get information?

(Fred Mirashi):   OK. That was my other question actually, the difference between a technical
                      support and the support. What – here, we're interested to see the assignment
                      of the support where they actually go and add data.

Chris Gardner: OK.

(Fred Mirashi):   But then what's the difference between that and the technical support?

Chris Gardner: So a technical support is just – the information (collective) is that is person
                      who would be contacted if questions arose concerning the chemical. They
                      don't have to ever touch the Form U; they're just the contact.

(Fred Mirashi):   OK.

Chris Gardner: And this at the user management page is where you would assign individuals
                      to actually populate or edit the Form U.

(Fred Mirashi): OK, OK. So the technical support doesn't really have to go – it just has to be identified by the primary authorized official. They don't need to go and actually sign up in CDX. Is that correct?

Chris Gardner: Correct.

(Fred Mirashi): OK. Yes.

Susan Sharkey: Well, if they – as long as they're not going to do anything with the form.

(Fred Mirashi): Correct, yes. I understand, yes. All right, very good. Thank you.

Operator: Your next question …

Chris Gardner: Just make …

Operator: Go ahead, sir.

Chris Gardner: Sorry. Just real quick, so then once you're done, remember to save.

(Erin): Yes, so click the Save button to make sure that you save. You can only click that, and then the support name will show up in the assigned field set. So that's how you know it was successful.

Susan Sharkey: OK, next question.

Operator: Your next question comes from the line of (Pam Mason).

(Pam Mason): Yes, hello. It may be self-evident now, but our facility is brand new, we did not even operate until 2013. So should I report zero or N/A for 2012?

Susan Sharkey: Yes, I – my – I would think you would just report zero.

(Pam Mason): OK. Again, just a simple question now, but thank you.

Operator: Your next question comes from the line of (Susan Maleti).

(Susan Maleti): Hi. Thank you. I was wondering about the previous year's volume. Is the numbering scheme for that going to be 20A is 2014, B as '13 and '12, or does

it not matter, I guess, in your XMLs, you just identify the year – the previous year?

Chris Gardner: I think within the XML, it's already distinguished.

(Susan Maleti): In the previous XML, they just said report past production volume and then it said year and you entered 2010 and then production volume in pounds. So you just identified it and then the pounds that went with that for the XML. But I was wondering on your – you went very quickly through that screen, I didn't actually see the numbering scheme for the 2014. Is that 20A and …

(Off-mike)

Susan Sharkey: Right. It would be – it's 20A, 20.B and 20.C for the past reporting, but …

(Susan Maleti): Right, but is A '14 and then C as '12?

(Erin): So …

Chris Gardner: The previous reporting year.

(Erin): Oh.

Chris Gardner: Click it.

Susan Sharkey: That's the one …

Chris Gardner: Oh, it's only 2B20.

(Susan Maleti): It doesn't have a number there; it's just 20B and then doesn't say A, B or C. But I guess the first one is '14.

Susan Sharkey: That's a good question. I will have to take a look and see what it's going to look in the schema.

(Susan Maleti): OK, great. And I also would like to emphasize the other several people have commented that being able to identify the CAS number and sort by that without having to enter, you know, very important for sites that have a large number of chemicals. So that's very important.

And the – I would also emphasize, as soon as possible, that the CDX is opened for entering data prior to the submission date of June 1st. Again, when there are lots of chemicals at site, a lot of times, it takes a lot of reiterations to get the information to validate. So if the CDX can be opened before June 1st, as early as possible, it would be very good for sites that have a lot of data to enter.

Susan Sharkey: OK. We have noted that. Thank you.

(Susan Maleti): Thank you.

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

(Claire Scott): Hi. So I'm feeling a little bit confused about the roles here. I've just recently, you know, been through your ePMN Thin Client presentations. I am not the person that normally would submit or, in the past, has submitted things. I've prepared all the forms. But now, with the ePMN roles, I'm going to have to sign up as an authorized official in order to populate the fields and the forms. Is that also true in the CDR? It seems to me that I don't have to be an authorized official in order to populate these forms.

Chris Gardner: So for CDR, you don't have to be an authorized official to populate the forms. You just need to be registered as a support, and then you have to have the primary authorized official assign you to the form.

(Claire Scott): OK.

Chris Gardner: And actually for the Section 5 PMNs, OK, you can also – there's multiple roles that we don't have for CDR. There's also an agent consultant role if you're not with the same company, and then there's also a support role associated with the Section 5. So you should not – if you're not the authorized official, you should not need to register as an authorized official.

(Claire Scott): OK. So here's my – we're going to have to go in. I prepare all our LVE forms. All right? So I'm going to have to go in before January whatever and register – re-register with CDX as a secondary authorized official or

something like that. I've got it all written down. And that will be site specific for ePMN. Do I have to go in and re-register with CDX for e-CDR?

Chris Gardner: No, no, you just need to be registered under the CSPP data flow and that will allow you access to all of the TSCA applications like the Section 5 CDR, et cetera.

(Claire Scott): So I don't have to change my role then?

Chris Gardner: No, the only thing you may have to do would be to manage your account and add roles to it, but you don't need to re-register every time.

(Claire Scott): OK. All right. I think that answers this. Oh, no, one more question. So since I was not the primary authorized official who submitted the 2012 CDR even though I prepared it and I send it to the authorized official to submit, will I be able to download that XML to take a look at it and see if we want to use it again?

Chris Gardner: No, you would need the primary authorized official to download that copy of record.

(Claire Scott): OK. Thank you.

Chris Gardner: You're welcome.

Operator: And you have a follow up question from the line of (John Chen).

(John Chen): Hi, I'm just – I have a question regarding resubmissions. So let's say, for example, you originally submitted, you know, with the 10 chemicals and later you may need to amend five of them. In that case, I just want to confirm the process is correct, you would – if you do the XML, you would re-upload all 10 of them except, you know, you would just amend the five, and then you would just resubmit the – all 10 chemicals but only five of them would be with the different information, the correct information. Is that correct, or can you just upload five chemicals that you need to amend the information to and if you upload that, will the other five chemicals where you didn't have to make a change, will that – would, I guess, CSPP remember the original submission

for the five, or would it like, if you just only submit the five amended ones, it would just cancel out the five originals?

I don't know if that makes sense, but I hope my question makes sense.

Chris Gardner: So, yes, the first thing, I wouldn't upload the XML unless you're doing a brand new submission because it will overwrite everything.

(John Chen):   OK.

Chris Gardner: If you're going to amend the submission, which is – is one that's already been submitted, what you need to do is you go to your form screen, and on the far right column to the site name is a little lock icon. Once it's submitted, you'll see a lock icon. You click on that icon and you'll have to enter your pass phrase as you see on the screen. And what that will do is that will actually unlock that submission. Then you – you click on the site link and that will open up the submission again and then you can jump to whatever chemical you need to adjust, make the changes, and then resubmit – oh, I'm sorry. And you also have to do the explanation for amendment, but you just go in and then you select the chemical from the navigation tree, make your changes, and resubmit. You don't need to use any XML upload for that.

(John Chen):   OK. And, I guess, just – then it follows then, I think, that – so you could do that and let's say, you know, you found out later that one of the chemicals did not have to be reported originally. In that case, what would you do? Like how would you resubmit so that the one chemical that you didn't have to report that you submit it, how can you delete that out? Is there a process for that?

Chris Gardner: Yes. So if you look on the screen right now, so you do the same process of unlocking your submission and then the navigation tree underneath each chemical folder, within each chemical folder, there's a little red X that says, "Remove."

(John Chen):   OK.

Chris Gardner: You need to click that X to remove the chemical and then you'd need to resubmit it.

(John Chen):   OK, got it. Thank you.

Chris Gardner: Welcome.

Operator: Your next question comes from the line of (Imogen Treble).

(Imogen Treble):   Yes, and I think you may have answered this. In the PMN – for the new Thin Client ePMN, there is the consultant agent role. I just wanted to confirm that that is not available in the CDR.

Chris Gardner: No, that is not available on the CDR at this point.

(Imogen Treble):   Is there any thought to making it available for future?

Chris Gardner: Potentially for the future. But adding that in would take a lot of work to recode the application, and I don't think we have the time for that at this point.

(Imogen Treble):   OK. Thank you.

Operator: Again, if you would like to ask a question, please press star and then the number one on your telephone keypad.

                   And you do have a question from the line of (Susan Maleti).

(Susan Maleti):   Yes. Hi. I wanted to check that when you do have to submit a correction, any primary authorized official can do that. It doesn't have to be the same primary authorized official that submitted before that can unlock it and resubmit. Is that correct?

Chris Gardner: That's correct, as long as they have the pass phrase for the form.

(Susan Maleti):   OK, fine, thank you very much.

Chris Gardner: You're welcome.

Operator: Again, if you would like to ask a question, please press star one. That is star one to ask a question.

                  And your next question comes from the line of (Tony Tantillo).

(Tony Tantillo): Yes, hi. I have a couple of questions. Can a primary authorized official be a non-U.S. citizen living in the United States?

Susan Sharkey: There is no citizenship requirement for any of the roles.

(Tony Tantillo): OK. And if I have to register as a primary authorized official under the TSCA Section 5 e-PMN Thin Client, does that carry over to this and vice versa?

Operator: Thank you for calling the conferencing center. An operator will be joining you momentarily. Please be prepared to provide your conference I.D. number and any additional information required …

(Tony Tantillo): Hello?

Operator: … by the company hosting this conference call. After all the information has been gathered, your line will either be placed on hold or joined to the conference.

                  (Off-mike)

Operator: Good afternoon. May I have your conference I.D. number, please?

                  Ladies and gentlemen, this is the operator. I apologize but there will be a slight in today's conference. Please hold and the conference will resume momentarily. Thank you for your patience.

Chris Gardner: So it seems like we had little technical issue and we were disconnected, but we're back if anyone has additional questions.

Operator: Again, if you would like to ask a question, please press star one.

                  And your question comes from the line of (Tony Tantillo).

(Tony Tantillo): Hi, I guess I was, of course, cutoff, I don't know. Anyway, I was going to ask, if you were already registered as a – as the authorized official for the Thin Client ePMN, do we have to do anything to be registered as the support personnel for CDR reporting?

Operator: … joining you momentarily, please be prepared to provide your conference I.D. number and any additional information required by the company hosting this conference call. After all the information has been gathered, your line will either be placed on hold or joined to the conference.

(Off-mike)

Operator: Good afternoon. May I have your conference I.D. number, please?

Ladies and gentlemen, this is the operator. I apologize but there will be another slight delay in today's conference. Please hold and the conference will resume momentarily. Thank you for your patience.

(Off-mike)

Chris Gardner: Hi, I guess we're having some problems being connected. I'm sorry. So if you have any questions, please let us know.

Operator: And you do have a question from the line of (Claire Scott).

(Claire Scott): So my question is very similar to (Tony's). I'm still not clear on the roles. And so here's a situation, we're a small company. I do all the payment forms, but in order to access the Thin Client, I have to now be an authorized official, so I'm going to register that way with one site we have. But I want to be a support, you know, registrant CDR. Is that possible?

Chris Gardner: Yes. So you need to do, is – so you need to have a primary authorized official under the CSPP flow that you'd be the support for, then you'd need to add the support role to your CDX account. And when you do that, you'll need to identify the – I think it's the user I.D. of the primary authorized official you'd like to be linked to.

(Claire Scott): OK, so I can be in two different roles …

Chris Gardner: Yes.

(Claire Scott): … in the CSSP program – or CSPP or whatever it is.

Chris Gardner: Yes.

(Claire Scott): OK, I think that's what (Tony) was trying to ask. I'm hesitant to ask him to try and ask again because …

Chris Gardner: Maybe he could just send us an e-mail.

(Claire Scott): Yes. But I think that that is what he was trying to ask, do I have to reregister? I'm already registered for the CSPP, so I don't have to register. I just have to add a role?

Chris Gardner: Exactly. You can hold every role within the CSPP data flow in your account.

(Claire Scott): OK, so I'm going to register first for the Thin Client because that's due first. I'm going to be a secondary authorized official, whatever.

Chris Gardner: It wouldn't be – are you – now, a secondary authorized official …

Susan Sharkey: If you're joint.

Chris Gardner: … is for joint submissions. That means you're supplying information for someone else's Section 5 submission. You would need to register as, it sounds like, a primary.

(Claire Scott): OK, a primary.

Chris Gardner: Yes.

(Claire Scott): I knew it's an authorized official. I've never had that role before. So I – because in order to fill out form, which my boss does not want to do, and let him submit it, I've got to be an authorized official. So I'm going to set up the site, I'm going to register as the authorized official. He is going to registered as an authorized official. And in CDR, he's going to pick me as the support.

Chris Gardner: Exactly.

(Claire Scott):   OK, that's my question. Thank you.

Chris Gardner: You're welcome.

Operator: Your next question comes from the line of (Tim Miller).

(Tim Miller):   Our company has gone through a number of a name changes over the years, and so the names that are currently in the CDR are not the current ones. How do you go about changing those?

(Erin):   So when you say, like, the names in the CDR need to be changed, do you mean like the site names or your organization name has changed?

(Tim Miller):   The site names have changed as well the organization.

(Erin):   OK. So what you want to is you would want to add your new organization name, and then under that new organization name, you would add the new sites that you have also. If you can't find that site, then you can add it as a new site.

     (Off-mike)

(Erin):   About the site?

Male: About adding or adjusting. Can they do that?

(Erin):   They can do that within the application now.

Chris Gardner: OK. Yes, you can also contact FRS as they manage the facility information.

(Erin):   Yes, you don't have to contact …

Chris Gardner: Yes?

Male: Right.

Chris Gardner: So, yes, you can contact FRS or you can edit it within the CDX – within the CDX accounts.

(Tim Miller):   OK, as – what role do you have to have to modify the company name?

Chris Gardner: You don't have to have an …

Male: Organization name, you're going to have to reregister.

(Erin):   Yes.

Chris Gardner: OK, if you're …

Male: Your new organization name.

(Erin):   Right.

Chris Gardner: If you – when you change the organization, you'll need to reregister because it's a new organization. So you'd have to submit the new ESA or go through the LexisNexis process again.

(Tim Miller):   OK, but it's only a name change.

Chris Gardner: I think it's because – because it's a new name, it would probably get a new identification number and that would make it a separate …

Male: You can use the same CDX account, you just need to add a new organization …

(Erin):   Yes.

Male: … to the account.

(Erin):   Right.

Chris Gardner: OK. Did you hear that? You can still use your CDX account; you just need to add the new organization.

(Tim Miller):   OK.

Chris Gardner: And then you would have to go through an update the facility information.

(Erin): To your new organization name.

Male: Yes.

Susan Sharkey: If you would like this in a more comprehensive response, if you can send an e-mail to ecdrweb@epa.gov. We can get a response back to you.

(Tim Miller): OK, I can do that. Thank you.

Operator: Again, if you would like to ask a question, please press star then the number one on your telephone keypad.

And your next question comes from the line of (Joan Hulk).

(Joan Hulk): Hi. If we want to have a consultant help us to compile our CDR and there is no agent consultant type role, what would we have the consultant register as?

Chris Gardner: I would probably recommend having them register as a support, and then you just assign them to the Form U or Form Us that they need to populate.

(Joan Hulk): OK, thanks.

Operator: As a reminder, if you would like to ask a question, please press star then number one on your telephone keypad. That is star one to ask a question.

Hold one and transcribe your first question, please.

Again, if you would like to ask a question, please press star one.

Caller, your line is open, please state your name.

Caller, your line is open. Can you please state your first and last name, please?

Chris Gardner: (Toni), I think they might be muted. We can't hear any of them.

Operator: If your line is on mute, can you please unmute it?

(Neha):   (Neha).

Susan Sharkey: OK, and what's your question?

(Neha):   Hi. My question is, can you kind of just recap the different roles that are available in these e-CDR web – it sounds like authorized official and the support role are the two primary roles – and the limitations of each role?

Chris Gardner: So the primary authorized official has no limitations. They can create, populate, edit and submit a Form U. A support needs to register and be linked to a primary authorized official and then be assigned to a Form U. Once that's done, they can add and edit the information but they cannot submit.

                   There's also the secondary authorized official who would, basically, have the authorized official roles but for a joint submission, which – this would be a company that's supplying a trade chemical to a primary authorized official and doesn't want the primary authorized official to know what they're submit – or what they're sending them.

                   And then there's the support role for the secondary authorized official also.

(Neha):   And do the – both the authorized official and the support roles, they have to submit a paper electronic – a paper signature to get the access?

Chris Gardner: No, the primary authorized official can go through what's called LexisNexis which is a third-party authenticator. If they do not pass LexisNexis, then they need to submit a paper ESA.

                   The support does not need to go through that process as they're basically approved and assigned by the authorized official.

(Neha):   OK. And the – I don't recall if – is authorized official term-specific to the e-CDR web or more to the CDR regulations? They're defined in the CDR regulation, or is this specifically created for this web submittal purpose?

Chris Gardner: No, that's actually a role that we have for the CSPP data flow. It goes – extends outside of the CDR submissions.

(Neha):   OK, so there may be criteria that will have to be met to assign someone us an authorized official.

Chris Gardner: Yes.

(Neha):   OK. Thank you.

Operator: Again, if you would like to ask a question, please press star then number one on your telephone keypad. That is star one to ask a question.

And you do have a question from the line of (Claire Scott).

(Claire Scott):   Sorry, I got – came up with another minute and it still has to do with these roles. In the new Thin Client, and this is what's confusing me, is the new Thin Client, you can have more than one primary authorized official. Can you have more than one primary authorized official in the CDR as well?

Chris Gardner: Yes, yes, you can.

(Claire Scott):   OK, thank you.

Operator: As a reminder, if you would like to ask a question, please press star then number one on your telephone keypad.

And there are no further questions as this time.

Chris Gardner: OK. Well, thank you, (Toni). If anyone else has any questions, you can please submit them to ecdrweb@epa.gov and we'll respond to them.

Other than that, we really appreciate your participation and all your questions. We're looking forward to you participating in the beta testing the tool and hope you have a wonderful afternoon.

Operator: This concludes …

Susan Sharkey: Thank you.

Operator: This concludes today's conference call. You may now disconnect your lines.

Chris Gardner: Thank you, (Toni).

END