The New Chemicals Program
Under Section 5 of TSCA

Topic: “Incomplete Notices”
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EPA’s Process for Screening Notices for Completeness

- Prescreening
- Screening after Day 1
- Disposition
Prescreening

- Occurs before Day 1, as soon as notice is received
- Quick review for errors, omissions, inconsistencies or ambiguities
- Focuses mostly on information on chemical identity of reported substance
- ~27% of notices are declared incomplete at the Prescreen stage
- Time limitations preclude comprehensive screening at this stage
Screening After Day 1

- Comprehensive screening performed as part of formal review process
- Catches specific errors not found at Prescreening stage
- ~ 5% of the notices are deemed incomplete at this stage
Disposition

- Notices declared incomplete during Prescreen will be mailed back to submitters along with checklist of problems identified.
- After Prescreen, submitters will only receive a letter with an accompanying check list.
- EPA will not further review such notices.
- Corrected notices must be resubmitted in their entirety and a new case number will be assigned.
- IMD will address incomplete notice user fees.
Common Errors in Notices

- Wrong chemical name
- Inconsistencies
- Incorrect/insufficient structural diagrams
- Page 5 not filled out for polymers or oligomers
- Missing identification for Class 2 chemical precursor(s) or polymer monomer(s)
Common Errors (con’t)

- Incomplete manufacturing information
- Method 1 not used for consolidated PMNs
- Support letter not provided for a reactant or PMN substance not fully identified
- Incorrect molecular formula
- Insufficient or deceptive generic chemical name
- Failure to make all needed corrections
Wrong Chemical Name

- Incorrect CA (9th CI) name consistent with EPA’s TSCA Inventory nomenclature policy
  - Synonyms
  - Common names
  - Trade names
  - IUPAC names

- Not all CA names are acceptable
  - Hydrates
  - Many SRU polymer names
  - Graft/block polymer names will not be used
Inconsistencies

- EPA unable to determine which part of submitted information is correct
- May involve two or more types of chemical identity-related information
  - Chemical name
  - CAS number
  - Molecular formula
  - Structural diagram
  - Identity of immediate precursor(s) or monomer(s)
  - Manufacturing process information
Inconsistencies will cause notices (even those using Method 1) to be deemed incomplete.

Do not provide to CAS (or anyone else, e.g., a consultant) any information different than that which will be submitted to EPA - present the same information in the same manner.

Errors may involve use of the “two percent rule” for polymers.
Incorrect/Insufficient Structural Diagram(s)

- Incomplete/incorrect Class 1 substance structure
- Incorrect representative/partial structure
- Diagram for Class 2 substance or polymer - does not contain all details reasonably ascertainable

- Allowed abbreviations:
  
  Me  (methyl)       Bu  (butyl)
  Et  (ethyl)        i-Bu  (iso-butyl)
  Pr  (propyl)       s-Bu  (sec-butyl)
  i-Pr  (iso-propyl) t-Bu  (tert-butyl)

  Ph  (phenyl)
Page 5 is required to be filled out for all substances containing or based on

- a polymer, or
- oligomer of variable molecular weight

“Typical composition” values or ranges for reactants must be $> 0\%$
Missing  Class 2 Chemical Precursor or Polymer Monomer Identification

- Missing specific chemical name and/or available CAS number for immediate precursor or monomer
- Free-radical initiators or chain-transfer agents used must be listed as reactants
- 9th CI CAS nomenclature not needed for listing immediate precursors or monomers - however the chemical name used must be sufficiently specific
Incomplete Manufacturing Information

- Manufacturing process information (i.e., specific name (and/or CAS number) and weight) missing for each starting material
- All non-reactants must be included
  - catalysts
  - solvents
  - other
Submitter did not use Method 1 to obtain correct chemical names for all substances reported in consolidated PMNs.
Support Letter Not Provided for Reactants or PMN Substances Not Fully Identified

- Applies in cases in which a supplier withholds full identification of a substance
- If a foreign supplier withholds full identity of the PMN substance to be imported, the supplier must provide a “Support Letter” with the correct CA (9th CI) name and all other identity information required for that type of substance
- If a “Support Letter” is needed to identify a reactant, the CA (9th CI) nomenclature requirement for the PMN substance is waived
Remaining Common Errors

- Incorrect Molecular Formula
- Insufficient or Deceptive Generic Name Provided
- Failure to Make All Needed Corrections

Remember that submitted information must be correct as well as complete!!
Error Screening “Check List”

- Will be filled out and attached to an incomplete notice when EPA mails it back to the submitter
- A check mark will indicate the general nature of each error, omission, inconsistency or ambiguity
- EPA chemists may add handwritten notes elaborating on the nature of the identified problem
- The “Check List” is not intended to explain exactly how to “fix” the notice or develop the correct 9th CI CAS name(s)
EPA Recommendations

When using Method 1:

- Fill out pages 4 or 5, 6 and 8 of EPA’s PMN form to provide complete chemical identity information to CAS
- Be sure to attach the CAS-developed nomenclature report to the PMN
- Look for corrections on the structure diagram, molecular formula, monomer/reactant identities that CAS (or other source) may have made on your order
Before submitting a notice to EPA, have a person knowledgeable in chemistry proofread and fully review the notice for typos, accuracy, and consistency.

Do not ask CAS any questions about EPA’s TSCA Inventory nomenclature policy or PMN reporting policies/rules.