

## Quick Reference Guide

### Creating a Secondary/Tertiary Form U

#### Pre-requisites

1. User is registered in CDX and has a role as either an Authorized Official or Agent/Consultant in the Chemical Data Reporting application.
2. See the User Roles and Access Quick Reference Guide for details.

#### Creating a Secondary/Tertiary Form

An  icon next to a field provides additional information about the field. To activate the legend place the mouse cursor over the icon and a brief explanation will display. This tooltip does not provide navigation.

1. Log in to CDX at <https://cdx.epa.gov/>.
2. Click the **Secondary Authorized Official** or **Secondary Agent/Consultant** link.
3. Select **TSCA Chemical Data Reporting (CDR) 2020** from the drop-down menu on the **Chemical Information Submission System** page.
4. Click the **OK** button.
5. Click the **Create New Form** button within the Actions column for the desired site on the **Manage Forms** page.
6. Create a **Passphrase** to secure access to your form. Enter the following information on the **Create Passphrase** page:
  - a. New Passphrase
  - b. Confirm Passphrase
    - i. The passphrase must be between 8 and 20 characters long and may not contain special characters (+, ?, , etc.)
  - c. After creating a passphrase, add a **Passphrase Hint** to help you remember the passphrase for this form. If you forget the passphrase, after three (3) failed attempts the hint will display. Please do not include the passphrase as part of your hint
7. Click the **Continue** button to proceed to **Step 1 – Form Information**.

#### Step 1 Form Information

##### Step 1.1 Secondary Company Information

1. Verify that the information displayed on the **Secondary Company Information** page is correct or update as needed.
  - a. If edits are not needed, proceed to step three 3.
2. Click the **Edit** button to update any details if needed.
  - a. Secondary Company Name
  - b. Secondary Company Address
  - c. Secondary Company Address 2
  - d. Secondary Company City
  - e. Secondary Company County/Parish
  - f. Secondary Company State/Province/Other
    - i. This is a required field if United States is selected from the Secondary Company Country drop-down menu



- g. Secondary Company Zip/Postal Code
- h. Secondary Company Country
  - i. Click the **Save** button to save the entered information.
  - ii. Click the **Cancel** button to close the secondary company fields without saving.
3. Click the **Continue** button to proceed to **Step 2 – Trade Products**.

## Step 2. Trade Product (New)

1. Click the **Add Trade Product** button on the **Trade Product Summary** page to navigate to the **Trade Product Identification** page.

### Step 2.1 Trade Product Name Substance Identification

#### Step 2.1.1 Known Chemical Substance(s) for the Trade Product

1. Select the **Yes** radio button in response to the Do you know the chemical substance(s) for the Trade Product Name? question.
2. Check the appropriate checkbox to mark the linkage between corresponding information and the chemical substance as confidential:
  - a. Company Information
  - b. Technical Contact Information
3. Enter the name of the trade product into the **Trade Product Name or Provided Company Trade Name** field.
4. Click the checkbox to claim the **Trade Product Name or Provided Company Trade Name** as Confidential Business Information (CBI).
5. Click the **Add Chemical Substances** button to generate the Search Substance Registry Services (SRS) window.
6. Search for a chemical via CASRN or CA Index Name:
  - a. Select the **Search by CASRN or CA Index Name** radio button
  - b. Enter a CASRN into the **CASRN (Matches Exactly)** field or
  - c. Enter a CA Index Name or other synonym search criteria into the **CA Index Name or Other Synonym** field
7. Search for a chemical by Accession Number and/or Generic Name:
  - d. Select the **Search by Accession Number and/or Generic Name** radio button
  - e. Enter Accession Number search criteria into the **Accession Number** field
  - f. Enter Generic Name search criteria into the **Generic Name** field
8. Click the **Search** button.
9. Select the radio button of a chemical substance result and click the **Save Chemical** button.
10. If a chemical is selected by Accession Number or Generic Name then select the applicable statement:
  - a. I wish to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the confidential portion of the TSCA Inventory.
  - b. I do not wish to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the confidential portion of the TSCA Inventory.
11. Enter a value into the **Percent Composition (%)** field.
12. Select a value from the Function of Chemical drop-down menu to indicate the function of the identified chemical substance.
13. Repeat steps 5 – 12 to add each chemical substance that makes the Trade Product if multiple.

14. Check the Table Contains non-reportable substances? checkbox to indicate that the total percent composition value is less than 100.
15. Enter any other information that regarding the trade product into the **Other Information** field.

### Step 2.1.2 Unknown Chemical Substance(s) – To be reported by a Tertiary Submitter

1. Select the **No - A third-party will provide that information** radio button in response to the Do you know the chemical substance(s) for the Trade Product Name? question.
2. Check the appropriate checkbox to mark the linkage between corresponding information and the chemical substance as confidential:
  - a. Company Information
  - b. Technical Contact Information
3. Provide the tertiary company information by completing the following fields.
  - a. Trade Product Name or Other Designation
  - b. Other Information
  - c. Tertiary Company Name
  - d. Tertiary Company Email Address
  - e. Tertiary Company Address
  - f. Tertiary Company Address 2
  - g. Tertiary City/Town
  - h. Tertiary State/Province/Other
  - i. Tertiary Postal Code
  - j. Select the appropriate value from the ‘Country’\* dropdown menu
4. Enter email address(s) to request the tertiary company submit a report based on the trade product information
  - a. To:
  - b. CC:
  - c. Additional Notes:
5. Click the **Send email now** button.
6. An email sent successfully notification message displays with the unique identifier.
7. Click the **Previous** button to navigate back to the **Trade Product Summary** page.
8. Click the **Continue** button to navigate to the **Technical Contact Information** page described in **Step 2.4**.

### Step 2.1.3 Primary Company Information

1. Enter the unique identifier you received from the Primary Company into the **Unique Identifier** field.
2. Click the **Populate Primary Company** button to populate the primary company information into the corresponding table.
  - a. **Parent Company** displays the name of the parent company
  - b. **Site** displays the name of the site
  - c. **Site Mailing Address** displays the physical address of the site
  - d. **Relationship CBI?** displays No if the Check if you wish to report the joint relationship as confidential checkbox was unchecked in a primary form and Yes if the Check if you wish to report the joint relationship as confidential checkbox is checked in a primary form.
3. Click the *Delete* icon within the Actions column to remove a primary company.
4. Click the **Previous** button to navigate to the **Trade Product Summary** page.



5. Click the **Continue** button to navigate to the **Technical Contact Information** page described in **Step 2.2**.

## Step 2.2 Technical Contact Information

### Step 2.2.1 Identifying/Adding a New Technical Contact

1. Select the **Create a new contact** radio button.
2. Click the **Click to copy information from CDX Registration** button to populate the technical contact details or
3. Enter technical contact information into the following fields:
  - a. Prefix
  - b. First Name
  - c. Middle Initial
  - d. Last Name
  - e. Suffix
  - f. Company Name
  - g. Telephone
  - h. Ext
  - i. Email Address
  - j. Mailing Address 1
  - k. Mailing Address 2
  - l. State (required if United States is selected from the Country drop-down menu)
  - m. Postal/Zip Code
  - n. Country
4. Click the **Save** button to save the entered contact details.
5. Click the **Cancel** button to close the technical contact fields without saving the entered information.
6. Select the radio button for a technical contact within the **Selected Contact** column.
7. Click the **Previous** button to navigate to the **Trade Product** page.
8. Click the **Continue** button to navigate to **Step 3 – CBI Substantiation** page.

### Step 2.2.2 Selecting an Existing Technical Contact

1. Select the **Choose an existing contact** radio button.
2. Click the **Previous** button to navigate to the **Trade Product** page.
3. Click the **Continue** button to navigate to **Step 3 – CBI Substantiation** page.

## Step 3 CBI Substantiation

### Step 3.1 Review claims for accuracy

#### Step 3.1.1 Substantiation Status

1. Review the **Status** column to determine whether the CBI claims listed require substantiation answers.
  - a. A **grey checkmark** indicates that although the chemical or trade product contains confidential claims, these claims are exempt from substantiation and do not require further action.
  - b. A **green checkmark** indicates that all of the confidentiality claims either have the required substantiation answers provided or are exempted from the need for substantiation.
  - c. A chemical **without a checkmark icon** indicates that some or all confidentiality claims are incomplete and do not contain the corresponding substantiation answers. To provide the answers to the substantiation questions individually, proceed to **Step 3.1.2**. To copy previously completed substantiation answers, proceed to **Step 3.1.2.1**.
2. After all confidentiality claims have been substantiated as required, select the **Continue** button.
  - a. A pop-up message will display *“Claims of confidentiality and, if required, substantiation of the claims are required at the time of submission (40 CFR 711.30(a)(1)). If you need to make additional confidentiality claims or substantiations, select the Cancel button to close this window and update the claims as needed. If your confidentiality claims and substantiations are complete, select the Continue button to move forward with the validation and submission of your form. Information not claimed as confidential in accordance with the requirements of 40 CFR 711.30 may be made public without further notice to the submitter.”*
  - b. If you are ready to submit your form, click the **Continue** button and proceed to Step 4. Otherwise click the **Cancel** button to return to the form and submit at a later time.

#### Step 3.1.2 Complete Substantiation Answers

1. If the chemical is missing a checkmark icon on the **Status** column, click the **Expand (+)** icon to view the sections that contain confidential claims.
  - a. There are up to two indicators for each section header:
    - i. (#/#) indicates the number of confidential claims made out of the total number of claims possible for that section.
    - ii. Checkmark icon, described in step 3.1.1, bullet 1.
  - b. If a section header has **(0/0)** listed, there are no confidential claims made in this section, and therefore substantiation answers are not needed.
  - c. If a section header has **(3/6)** listed, it means that you claimed 3 out of a total of 6 possible data elements as confidential data elements.
  - d. If a section header has a **green checkmark** displayed, this indicates that substantiation answers have been provided or are not required, and this section is complete.
  - e. If the **checkmark icon is not displayed**, this indicates that substantiation answers are missing and need to be provided.
2. Click the **section header** to expand the menu and see the data elements that require attention.
3. Scroll up or down to find the available links for elements claimed confidential.
4. Each element has a set of general questions with Yes or No selections and an explanation text box that allows you to provide the corresponding answer to the question. Complete each set of questions by selecting the appropriate radio button (Yes/No) for each question.

5. Check the corresponding CBI checkbox to claim the substantiation answer as confidential.
6. After completing all corresponding questions, click the **Save** button to continue with the next element.
7. After all the claims have been substantiated and the substantiations saved, the green checkmark will show on the **Status** column.

### Step 3.1.2.1 Copy Substantiation Answers

**Prerequisites:** For at least one chemical in your submission, at least one green checkmark is shown in the Status column.

1. If the chemical or trade product is missing a status icon, click the **Copy** (paper stack) icon to trigger the copy functionality.
2. Select a chemical from the dropdown menu from which you wish to copy substantiation answers.
  - a. If a chemical does not display, it is not eligible to be copied.
3. Once a chemical has been selected, choose one of the following options:
  - a. Click the **Copy Substantiations** button to copy all applicable chemical substantiations from the selected chemical to the chemical or trade product you are editing.
  - b. Click the **Copy Substantiations to All** button to copy all applicable chemical substantiations from the selected chemical to all applicable chemicals or trade products in the form.
    - i. During the copy process, existing substantiation answers are not overwritten.
  - c. Click the **Cancel** button to discard and close the copy functionality.
4. Click the **Continue** button to proceed with the submission.
5. The following disclaimer displays: *Claims of confidentiality and, if required, substantiation of the claims are required at the time of submission (40 CFR 711.30(a)(1)). If you need to make additional confidentiality claims or substantiations, select the Cancel button to close this window and update the claims as needed. If your confidentiality claims and substantiations are complete, select the Continue button to move forward with the validation and submission of your form. Information not claimed as confidential in accordance with the requirements of 40 CFR 711.30 may be made public without further notice to the submitter.*
6. Click the **Continue** button to confirm and return to **Step 4 – Review and Submit** or
7. Click the **Cancel** button to return to the **CBI Substantiation** page.

## Step 4 Review and Submit

### Step 4.1 Submitting Official Information

1. The information has been pre-populated from the Primary Authorized Officials CDX registration. If the information listed is incorrect, please make the appropriate edits to the Authorized Officials user information in CDX registration.
2. Check the CBI checkbox to claim the submitters contact information as confidential.
3. Provide the corresponding substantiation for the confidentiality claim of the Submitting Official Information.
4. Check the associated checkbox to confirm your acknowledgement of the legally responsible certification statement.
5. Click the **Start Submission Process** button to activate the submission process.

#### Step 4.2 TSCA CBI Certification

1. Review the **TSCA CBI Certification** disclaimer and certify that all claims for confidentiality asserted with this submission are true and correct.
2. To accept, click the **Continue** button or click **Cancel** to return to the Submitting Official Information page.

#### Step 4.3 CDR Certification

1. Review the **CDR Certification** disclaimer.
2. To accept, click the **I Certify** button or click **Cancel** to return to the Submitting Official Information page.

#### Step 4.4 Validation

1. The application performs a validation check on the information provided.
  - a. If the form passes the validation check, the CDR Validation window displays with No Errors Found. Close the window and click the **Review & Submit** button to proceed to Step 4.5 or click **Cancel** to return to the Submitting Official Information page.
  - b. If the form fails the validation check, the CDR Validation window displays with the identified errors.
  - c. Review the identified errors and click the error hyperlink to navigate to the appropriate page and correct.
  - d. Click the Validate link again to re-validate a form.

#### Step 4.5 PDF Generation

1. The form automatically generates a PDF format of the CDR Electronic Reporting form. If your form contains more than 20 chemicals, a separate PDF will be generated for each 20 chemicals. Therefore, a form with 30 chemicals will generate 2 PDFs and a form with 105 chemicals will generate 6 PDFs.
2. Click the **Download** button to download a copy of an individual PDF.
  - a. The form automatically generates a PDF format of the CDR Electronic Reporting form. If your form contains more than 20 chemicals, a separate PDF will be generated for each 20 chemicals. Therefore, a form with 30 chemicals will generate 2 PDFs and a form with 105 chemicals will generate 6 PDFs.
3. Click the **Sign, Encrypt, and Submit** button to complete the submission process in Step 4.6 or click **Cancel** to return to the Chemical Summary page.

#### Step 4.6 CROMERR Signature

1. Click the **Accept** button on the pop-up window that reads: *“I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.”*
2. Enter the CDX password and click the **Login** button.
3. Enter the answer to the Verification question and click the **Answer** button.
4. Click the **Sign** button.
5. Click the **Home** button to return to the Home page or **Logout** to leave the application.



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