

**Helpful Hints
for
CDX Registration and Submission of the e-PMN**

This Helpful Hint document is intended to focus on e-PMN program specific questions and answers. For more general Frequently Asked Questions (FAQs) with regards to CDX, please go to <https://cdx.epa.gov/SSL/cdx/FAQ.asp>.

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Disclaimer: This Helpful Hints document is not a rule and is not legally enforceable. The document explains some of the electronic reporting requirements in 40 CFR parts 720, 723 and 725 applicable to documents submitted pursuant to those provisions. The document also discusses recommended practices for such submission. The document neither creates any new requirements nor replaces existing established laws or regulations. The use of the word "should" in this document means that something is suggested or recommended, but not required.

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Who needs to register

1. Who needs to register with CDX?

There are two types of registered persons who can submit e-PMN documents electronically via CDX: those who are authorized to legally sign the Premanufacture Notification (PMN) form or other notices (i.e., Authorized Officials); and those who are designated and approved by the Authorized Official to submit support documents (i.e., Support Registrants). Persons who prepare draft versions of Section 5 Notices and Notice supporting documents need not register.

2. Who is an Authorized Official?

An Authorized Official is a person in a company legally responsible for the data in the notice submission. Generally, this would be the person who signs the certification page on the paper version of the PMN form. Upon submission, the ePMN software will verify with CDX Registration that the Authorized Official is the same as that listed in Section A.1a. of the PMN form, Section I of the Biotechnology form, the top of Part I of the NOC form or Section II and/or III of the Support form.

3. Who is a Support Registrant?

A Support Registrant is a person designated by an Authorized Official to submit supporting documents on his/her behalf. The Support Registrant can be another person from the Authorized Official's company or they can be a person from outside the company such as an agent or a consultant. Upon submission, the ePMN software will verify with CDX Registration that the Support Registrant is the same as that listed in Section III of the Support form.

4. How does an Authorized Official view Support Registrants via CDX?

There is a link on the MyCDX website in CDX Registration for Authorized Officials to view all the Support Registrants linked to their UserID. The view lists the Support Registrant personal information and their registration status. MyCDX is the default site in CDX Registration after a submitter has registered as either a Support Registrant or an Authorized Official.

5. How does a Support Registrant view their Authorized Officials via CDX?

There is a webpage called List Roles in CDX Registration. In this webpage, the registrant can see his/her roles, the status of his/her registration requests, and the Program IDs for the Authorized Officials (a CDX generated number for all Authorized Officials). By clicking on the Program ID, a pop-up window will display the Authorized Officials information. This webpage can be found by selecting the link "Edit Current Account Profiles" in the MyCDX website. MyCDX is the default webpage in CDX Registration after a submitter has registered as either a Support Registrant or an Authorized Official.

6. Do I need to register for every Authorized Official?

Yes. A Support Registrant will have to register and be approved for every Authorized Official for whom he/she will be sending documents. A separate Verification form ("Authorization and Verification for Section 5 Notice Support Submitter by Company

Authorizing Official”) is needed for each Authorized Official/Support Registrant relationship. However, the Support Registrant only needs one signed and notarized Electronic Signature Agreement (ESA) form on file at EPA even though he/she may be working for more than one Authorized Official.

7. *If I previously registered for eIUR 2006, will I need to re-register for e-PMN?*

Yes, you will have to completely re-register for e-TSCA/e-PMN in CDX. This includes sending the signed and notarized new Electronic Signature Agreement (ESA) form and a signed verification form to EPA.

How to Register

8. *When do I need to register for a CDX account?*

Registration with CDX may occur at any time after the publishing of the e-PMN final rule (January 6, 2010); you do not have to wait until the effective date of the final rule.

If you are planning to submit a document created by the e-PMN software to EPA using CDX, you will need to register in advance of submitting a document. It will take several days (typically 5-10 business days) for the registration process to be completed once EPA has received the signed and notarized documentation. Once EPA has approved the account and the 20-5-1 security questions have been answered (see question 10 for more detail), your CDX account will become active and you will be able to submit documents via CDX.

9. *Where do I go to register for a CDX account?*

The address for registering with CDX is http://cdx.epa.gov/epa_home.asp. There are two additional places where you can find a link to the CDX website: in the e-PMN software opening screen and through the EPA’s New Chemicals Program website (<http://www.epa.gov/oppt/newchems/epmn/epm-index.htm>)

10. *How do I register for electronic submissions in CDX?*

Registration is a four-step process: (1) basic registration information; (2) Electronic Signature Agreement and Verification Forms; (3) e-mail announcing account activation; and then (4) completion of the 20-5-1 Security Questionnaire.

Step 1) -For the basic registration information, you will be prompted for the following:

Full name;
User ID (“User Name”/Login Name);
Password;

Formal company name where you are employed
(*E.g.* not merely “Test”, but “Test Chemicals Inc.”);
Company address (two lines are provided);
Your corporate phone number;
Your corporate e-mail address

Please note that the information provided in CDX Registration must agree with the contact information in the submission documents.

Step 2) -The three forms provided by CDX during registration are the e-TSCA Electronic Signature Agreement (ESA) and the Verification forms (one for Authorized Official called “Verification of Company Authorizing Official” and one for a Support Registrant called “Authorization and Verification for Section 5 Notice Support Submitter by Company Authorizing Official”). The ESA contains information entered in CDX registration along with terms of the agreement, the submitter’s signature and the signature of a notary public. This form is the main registration form for CDX. The Verification form contains the signed statement that the data is accurate and truthful. Once these forms have been printed and signed, they can be mailed or delivered to the following addresses:

By U.S. Postal Service: PMN CDX Registration Coordinator (7407M), U.S. Environmental Protection Agency, Office of Pollution Prevention and Toxics, Ariel Rios Building, 1200 Pennsylvania Ave, NW, Washington, DC 20460.

By Hand Delivery or Courier: PMN CDX Registration Coordinator, U.S. EPA- OPPT/CBIC, EPA East Building, Room 6428, 1201 Constitution Ave, NW, Washington, DC 20004-3302, 202-564-8930; 202-564-8940.

Step 3) -EPA will approve your registration account after it receives and verifies the information on the forms with the information in the CDX registration data base. EPA will then send an e-mail to your corporate e-mail address to notify you of your approval and to instruct you to log back into the CDX registration website and complete the 20-5-1 Questionnaire.

Step 4) -The “20-5-1 Questionnaire” is a special security feature that helps to ensure your identity in CDX. Many other commercial and government websites are also using this feature. You will be given a list of 20 personal knowledge questions (e.g., “Favorite Color,” “Name of Pet,” “Mother’s Name” etc) and you will be asked to select and answer five of the questions from the list. Once the questions have been completed, you may submit documents to the EPA via CDX. Every time you use CDX to transmit submissions electronically to EPA or download documents, you will be prompted with one randomly selected question of the five you answered during registration.

11. How do I know if my Registration Request has been approved?

After EPA has approved and activated the Authorized Official’s or Support Registrant’s registration request, CDX will send the registrant a generic e-mail which states that an account has been approved. To verify which account was approved, the registrant will need to go to the CDX Registration webpage called List Roles (see below). In this webpage, the registrant can see his/her roles, the status of his/her roles, and the Program ID for the Authorized Official associated with that account. The status will either be Awaiting Approval, Active, or Deactivated. When the status is “Active”, the registrant may submit under that role.

12. How do I add another role?

In order to add another role, you may do so from the List Roles website. To get to the List Roles webpage, go to the “MyCDX” webpage in CDX Registration and select “Edit Current Account Profiles,” then select “List Roles” on the far right. In this webpage, the registrant can see his/her roles, the status of his/her roles, and the Program IDs for the Authorized Officials. Under the roles is a link to “Add New TSCA Role/Program ID”. After selecting this link, a webpage will appear where the role of Authorized Official or Support Registrant may be selected.

13. If an Authorized Official’s account is deactivated, how will the Support Registrants know?

If an Authorized Official’s account is deactivated, all Support Registrants’ accounts associated with him/her will be deactivated as well. The Authorized Official and all associated Support Registrants will receive a generic e-mail that states an account has been deactivated. In order for the Support Registrant to view the status of his/her account(s), he/she may do so from the List Roles webpage. To get to the List Roles webpage, go to the “MyCDX” webpage in CDX Registration and select “Edit Current Account Profiles”. Then select “List Roles” on the far right. In this webpage, the registrant can see his/her roles, the status of his/her roles, and the Program IDs for the Authorized Officials. The status in this instance for the Support Registrant will indicate that his/her role has been deactivated.

14. Do I need to submit another ESA once I have been approved?

An Electronic Signature Agreement (ESA) only needs to be submitted and approved by EPA once for the e-TSCA/e-PMN Program. If a person adds another role (e.g., becomes a Support Registrant for a different Authorized Official), he/she will be asked to print, sign, and send in a Verification form only.

The submission process- the CDX Node within the e-PMN tool***15. After Registration and EPA approval, what happens next?***

After registration and approval, the submitter will receive an e-mail stating that his/her account is now active. The submitter will return to the CDX Registration website and complete the 20-5-1 questions. After answering the questions, the submitter will be taken to the “MyCDX” website where he/she can download the e-PMN software. Once the software has been downloaded and installed, the submitter can begin to create documents. Once the documents are ready for submitting to EPA, the submitter selects “to finalize the file and submit via CDX”. A node (portal) to CDX is opened. The submitter enters his/her User ID and password. The submitter selects the “Submit” button and answers the 20-5-1 security questionnaire. An encryption key is generated and placed onto the hard drive (this only happens the first time a submitter uses that particular computer to submit via CDX). The submission is encrypted and sent to EPA for processing. An e-mail is sent to the submitter stating that the transmission was successful. A Copy of Record is transmitted back to the submitter containing a read-only version of the submission which can only be opened by the original encryption key.

16. How will I know if there is an error during electronic submission?

If there is any type of error in transmission through CDX, you should contact the CDX Help Desk for further instructions before attempting transmission again. Transmitting the same package a second or third time will cause confusion with EPA processing. The CDX Help Desk might be able to solve the problem and have the transmission go through successfully without you having to retransmit it. They may also detect a problem and fix it, but may need you to transmit your package again. Either way, you should wait for instructions from the CDX Help Desk before attempting transmission again.

17. How can I tell if the electronic submission has gone through successfully? How long will I have to wait for a reply?

A few minutes after selecting the “Submit” button, select the “Check Transaction Status” button. The submission status will either stay as “Pending” or it may change to “Successful” or “Failure”. If “Successful”, you will receive an e-mail with the CDX Transaction ID number. If your status is Failure, call the CDX Help desk.

18. How will I know if there is something waiting for me in CDX?

For all transmissions from EPA to you via CDX, EPA sends you a generic e-mail to your corporate e-mail address notifying you that something is ready for downloading from CDX through the e-PMN software. This e-mail does not contain any TSCA-CBI.

19. What is the Copy of Record?

You will be provided with an electronic Copy of Record of your submission after transmitting your submission through CDX. After EPA receives, decrypts and unzips your submission, EPA automatically zips it and encrypts it again using a special encryption key received from CDX when you first verified your account in CDX. EPA then sends this package back to a CDX backend node where you can access it through your e-PMN software for downloading. You will not need to have your e-PMN software open on your work station to know that something is available for download. EPA sends an e-mail notification to the submitter that the Copy of Record is available.

Once you receive this e-mail notification and open the CDX node from the e-PMN software (and after verifying your UserID, Password and the 20-5-1 Questionnaire), the e-PMN software automatically uses the corresponding decryption key to download the submission. This is the Copy of Record. It is not merely a mirror copy of your originally zipped and encrypted submission - it is what EPA has received, re-encrypted and sent back to you for your records. The Copy of Record is equivalent to a photo-copy of your paper submission from EPA verifying what you sent. The file is a read-only file and cannot be altered.

CDX Registration Maintenance***20. How do I make changes to a registration?***

After you log into your CDX account with your username and password, your account home page (MyCDX) has links to change the following: your personal profile information; company information; and your CDX program or role (Authorized Official or Support Registrant).

Any personal profile information (UserID, Password, your password secret question) you provide in CDX registration can be changed and updated. Personal corporate mailing address and phone number can also be changed and updated. However, changing the official corporate name is a different issue. Please contact CDX Help desk, if the name or identity of the corporation has changed (e.g., change in name, bought as a subsidiary, sold or split off from the original parent company, etc).

You may also register for a new program by selecting “Edit Current Account Profiles” in the MyCDX webpage and selecting “Add New Program”. If you want to add another role to an existing Program, select “List Roles” from this site. An example of adding another role would be a Support Registrant registering for another Authorized Official.

21. How do I remove my account from CDX?

Please contact EPA by letter on company letterhead to the address specified below (and in the CDX Electronic Signature Agreement form) to remove a name from the CDX account:

By U.S. Postal Service: PMN CDX Registration Coordinator (7407M), U.S. Environmental Protection Agency, Office of Pollution Prevention and Toxics, Ariel Rios Building, 1200 Pennsylvania Ave, NW, Washington, DC 20460.

By Hand Delivery or Courier: PMN CDX Registration Coordinator, U.S. EPA- OPPT/CBIC, EPA East Building, Room 6428, 1201 Constitution Ave, NW, Washington, DC 20004-3302, phone numbers: 202-564-8930; 202-564-8940.

Submitter Use of the Tool/Submitter Responsibility

22. Can I share my User ID and password with others in my company?

No. You may not share your User ID, password or 20-5-1 questionnaire with others. This violates the terms of agreement in the Electronic Signature Agreement. Complying with the terms of the agreement protects everyone’s information. Violating these terms puts your information at risk. If more than one person at your company needs to submit information, then each one needs to go through the registration process.

23. Can I submit documents from more than one computer?

A private key located on the local machine is created upon the first submission to EPA via CDX. In order to submit via CDX from more than one computer, you must copy your private key from the e-TSCA default location (most likely, in the C:\Documents and Settings\username folder with the extension “[userid]-cromerr-keystore.jks”) and paste it into the second computer (same location). This way you will have the same key on both machines and you will be able to open/download documents within CDX which have been encrypted using this key. Otherwise, you will create a new private key for the second computer which cannot be used to open documents sent using the encryption key from the first computer.

24. Can more than one person use the same computer to submit via CDX?

Yes. When you log into your CDX account for the first time, an encryption key (named based on your User ID) is stored on the computer. When a second person logs into his/her own CDX account on the same computer, a separate encryption key (named based on the second person's User ID) is generated for the second person and is stored on that computer as well.

25. Should I leave the Copy of Record in CDX?

No. The Copy of Record in CDX is encrypted and only available to the original submitter who must use his/her original encryption key to decrypt and download the document. If the key is lost or becomes corrupted, the document in CDX will become unavailable to the company.

26. Can others review information on the submission before I send it electronically?

Some companies may have more than one person collaborating on a document. There are a number of ways your company can review the information in a document:

- Install the e-PMN software on multiple computers within your company which would allow others to open and modify the document directly within the software;
- Save the document as a PDF and e-mail it around for review and comment; and/or
- Print the document and pass a paper copy of the PDF around your company for review before you submit electronically.

General**27. Can I submit TSCA Confidential Business Information? Will it be protected?**

Yes. The e-PMN Software and EPA's data bases are designed for you to safely transmit TSCA Confidential Business Information (TSCA-CBI) via CDX. As you complete the form and provide attachments, the tool automatically zips everything into one file. The tool then automatically encrypts this file and (after verifying your UserID, Password and the 20-5-1 Questionnaire) sends it through CDX to EPA. CDX is unable to open up your submission. EPA receives a matching decryption key with your submission in a secure environment. Only EPA has the matching decryption key; therefore, your TSCA-CBI is fully protected. EPA then decrypts and unzips your submission for further processing.

28. How do I get help if I need it?

EPA will have a centralized call center number for any issues associated with the software or CDX. Please contact CDX by e-mail at cdxhelpdesk@itxfc.com or by calling the CDX Help Desk through the toll free telephone support on 888-890-1995 between 8:00 am to 6:00 pm (EST) Monday through Friday. International callers who wish to contact the CDX Help Desk should dial 970-494-5500.