Section 8(a) PAIR User Guide – Primary Authorized Official

Environmental Protection Agency

Office of Pollution Prevention and Toxics

Manage Toxic Substances

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1   Introduction

This document presents the user guide for the Office of Pollution Prevention and Toxics (OPPT) 'Section 8(a) PAIR' application submission process. This document is the user guide for the Primary Authorized Official (AO) user of the Section 8(a) PAIR tool. The Primary AO is the person legally responsible for the submission of Section 8(a) PAIR data for the reporting company. The AO is typically a senior official for the reporting company and may be the supervisor of the person (or persons) completing the submission.

As a Primary AO, you can create a new submission and assign Supports to edit and complete a submission on your behalf. You are responsible for submitting all the required information and are legally responsible for the information submitted to EPA within each Section 8(a) PAIR submission.

General information on Section 8(a) PAIR is available on the TSCA Section 8(a) website available at http://www.epa.gov/oppt/chemtest/ereporting/index.html. Information on CDX registration, including user roles that apply to completing a Section 8(a) Notice, is available at http://cdx.epa.gov/About/UserGuide

Toxic Substances Control Act (TSCA) regulations require industry to provide the Environmental Protection Agency (EPA) with documentation regarding chemical production, manufacture, distribution, use, disposal, import, and export. As a result, the implementation of TSCA has generated a large volume of documents submitted to the Agency by the regulated community

For questions concerning the TSCA Section 8(a) Notice software requirements, please contact the Central Data Exchange (CDX) Help Desk at helpdesk@epacdx.net or call 1-888-890-1995 between the hours of 8am – 6pm Eastern Standard Time (EST). For TSCA Section 8(a) Notice reporting requirements, please contact the TSCA Hotline at TSCA-Hotline@epamail.epa.gov or call 202-554-1404.

1.1   Labeling Confidential Information

This user guide presents instructions and screenshots for the 'Section 8(a) PAIR' electronic application as if you were logged in as the Primary AO. As the Primary AO you are able to create, modify, delete, and submit an 8(a) form. The user may claim certain information as Confidential Business Information (CBI). If the data is claimed as CBI, it will be treated in accordance with Agency confidentiality regulations at 40 CFR part 2, subpart B.
This TSCA Section 8(a) PAIR electronic application is optional for the production and submission of these filings. The paper option for filing will continue to be allowed.

Potential users may find that the use of this application saves time, burden and, because it is in an electronic format, provides easy access to reporting forms. Potential users are reminded to carefully read and follow application instructions. Persons who wish to use this application must address all provisions in the application, including those relating to indexing information (i.e., company name, address, chemical name etc.) and those related to CBI submissions, including the requirement for the submission of sanitized or redacted filings.

Please note that certain CBI claims will not be accepted if you choose to use this electronic application for TSCA Section 8(a). For example, chemical name and/or chemical identity, if the chemical is listed on the public portion of the TSCA Inventory, may not be claimed as CBI in a

submission using this application. Similarly, the user must enter a non-confidential study title, because it may not be claimed as CBI. EPA does not expect that such information, if evaluated under procedures at 40 CFR part 2, subpart B, would generally be found entitled to confidential treatment.

If the user believes that these or other data elements should be treated as CBI, then the user may use the paper option to file the Section 8(a) PAIR and assert CBI claims.

The following fields can be claimed as CBI within the 'Section 8(a) PAIR' application:

- Technical Contact Information
- Submitting on Behalf of Company information
- Plant Site Physical Location information
- Mailing Address information
- Information regarding plant site activities:
  - o Manufacture of the Chemical information
  - o On-Site Use as a Reactant information
  - o On-Site Nonreactant Use of the Chemical Substance information
  - o On-Site Preparation of Products information
  - o Manufacturer's Products information
- Information regarding the chemical substance processing by customer information
  - o Customer Uses and Products information
  - o Customer Process Categories information
- Any document uploaded with the 40 CFR 766 flow
- Official Submitter Information

2 System Requirements

To use the Section 8(a) PAIR Reporting application to submit a Section 8(a) PAIR form, the following are required:

- An e-mail account
- A supported web browser (see Section 2.1 below) with Java Script enabled Internet access.
- Adobe Acrobat Reader 5.0 or higher
- CDX username and password

2.1 Supported Browsers

- Internet Explorer 7 or above
  - Go to the following link to download:
    http://windows.microsoft.com/en-US/internet-explorer/downloads/ie
- Mozilla Firefox 3.5 or above
  - Go to the following link to download:
    http://www.mozilla.com/en-US/firefox/all-older.html
- Safari 4 or above
  - Go to the following link to download:
    http://support.apple.com/kb/dl877
- Google Chrome
  - Go to the following link to download:
    http://www.google.com/chrome

2.2 Screen Resolution

Screen resolution should be set to 1024 x 768 or greater.

3 Primary Authorized Official Functions

This section describes how to:

- Access the application
- Navigate the Section 8(a) PAIR 'Home' Screen
- Assign Support users to complete a submission
- Start and complete a Section 8(a) PAIR form
- Submit to EPA via CDX
- Download a Copy of Record
- Create an amendment

The Primary AO is the person legally responsible for the submission of Section 8(a) PAIR data for the reporting company. The AO, typically, is a senior official for the reporting company and may be the supervisor of the person (or persons) completing the form.

As a Primary AO, you can create a new form. You can also assign Supports to edit and complete forms on your behalf. You are responsible for submitting all required information and are legally responsible for the information submitted to EPA within each Section 8(a) PAIR form.

You can save the submission at any point during the data entry process. The save functionality will allow you to return to that same submission at any point in the future. You can print the document at any point; however, the 'Not For Submission' watermark will be placed on the portable document format (PDF) document each time the submission is printed.

3.1 Log into Section 8(a) PAIR Reporting application

After you create an account in CDX and click the 'Primary Authorized Official' link under the Chemical Safety and Pesticide Programs (CSPP) program service, you will be taken to the 'Chemical Information Submission System' screen.

Note: Information on CDX registration, including user roles that apply to completing a Section 8(a) PAIR, is available at http://cdx.epa.gov/About/UserGuide

Exhibit 3-1 shows a screen capture of the 'Chemical Information Submission System' screen:

Exhibit 3-1: Chemical Information Submission System Screen

Navigation: To access the Section 8(a) PAIR Reporting 'Home' screen, select the 'TSCA Section 8(a) PAIR Reporting' Submission Type from the drop-down menu and click the 'OK' button.

3.2   Home Screen Navigation

You can access the Section 8(a) PAIR Reporting 'Home' screen by selecting the 'TSCA Section 8(a) PAIR Reporting' Submission Type from the 'Chemical Information Submission System' screen drop-down menu and by clicking the 'OK' button.

The Section 8(a) PAIR Reporting 'Home' screen is the first screen within the Section 8(a) PAIR Reporting application. It provides you with links and tabs to access the 'Forms,' 'User Management,' and 'Resources' screens. To navigate to any of these screens, click the screen link (located in the middle of the Section 8(a) PAIR Reporting 'Home' screen highlighted in blue), or click the screen tab (located within the application header through the application). The links and tabs provide the same functionality.

- **Forms:** Click the 'Forms' link or tab to navigate to the 'Section 8(a) PAIR' forms screen. You can create or modify a Section 8(a) PAIR Reporting form using the 'Section 8(a) PAIR' forms screen. For additional details about the 'Section 8(a) PAIR' forms screen, please refer to **Section 3.4.1.**

- **User Management:** Click the 'User Management' link or tab to navigate to the 'User Management' screen. You can manage the access rights of Supports for each form number using the 'User Management' screen. For additional details about the 'User Management' screen, please refer to **Section 3.3**.

- **Resources:** Click the 'Resources' link or tab to navigate to the 'Resources' screen. You can find the Section 8(a) PAIR Reporting User Guide, as well as useful links for further usability instruction on the 'Resources' screen. For additional details about the 'Resources' screen, please refer to **Section 9**.

Exhibit 3-2 shows a screen capture for the Section 8(a) PAIR Reporting 'Home' screen:

Exhibit 3-2: Section 8(a) PAIR Reporting Home Screen

Navigation: Click the 'User Management' link or tab to access the 'User Management' screen and assign Supports.

3.3   User Management

You can access the 'User Management' screen by clicking the 'User Management' link or tab from the Section 8(a) PAIR Reporting 'Home' screen.

On the 'User Management' screen, you can assign your Supports to fill out Section 8(a) PAIR forms. You have the ability to assign one or more Supports to modify any of the Section 8(a) PAIR forms you have created. In order to grant a Support access to a Section 8(a) PAIR form, you must create a new submission and assign a passphrase to that submission. You can also assign different Supports to complete the data entry process for multiple submissions.

Form Alias: A form will not be available in this drop-down menu until it has been created. Select a form alias from the drop-down menu to begin assigning Supports. Once a form has been selected, the 'Assign Users' group box will update to display only the Supports who have identified you as their AO during CDX Registration.

Assign Users to Form Type: This box shows all the Supports you can assign to complete a Section 8(a) PAIR Reporting form for the submission type selected. To move Supports from the 'Unassigned' group box to the 'Assigned' group box, highlight individual or multiple Supports and click the 'add >>' button. To move Supports from the 'Assigned' group box to the 'Unassigned' group box, highlight individual or multiple Supports and click the '<<remove' button.

- **Unassigned:** This box contains the registered Supports who have identified you as their AO that can be assigned to access and edit the selected submission. To highlight multiple Supports, hold down the <Ctrl> key on your keyboard while clicking each Support. To highlight multiple consecutive Supports, hold down the <Shift> key on your keyboard while clicking the first and last Support.

- **Assigned:** This box contains the registered Supports who have been given permission, by you, to access and edit the selected submission. To move Supports from the 'Assigned' group box to the 'Unassigned' group box, highlight individual or multiple Supports and click the '<< remove' button. To highlight multiple Supports hold down the <Ctrl> key on your keyboard and click each Support. To highlight multiple consecutive Supports, hold down the <Shift> key on your keyboard and click the first and last Support.

When you have finished assigning Supports, click the 'Save' button to save the selection. To navigate away from the 'User Management' screen, you can click the CSPP logo, 'Home,' 'Forms,' or 'Resources' tabs located within the application header.

Exhibit 3-3 shows a screen capture of the 'User Management' screen:

Exhibit 3-3: User Management Screen
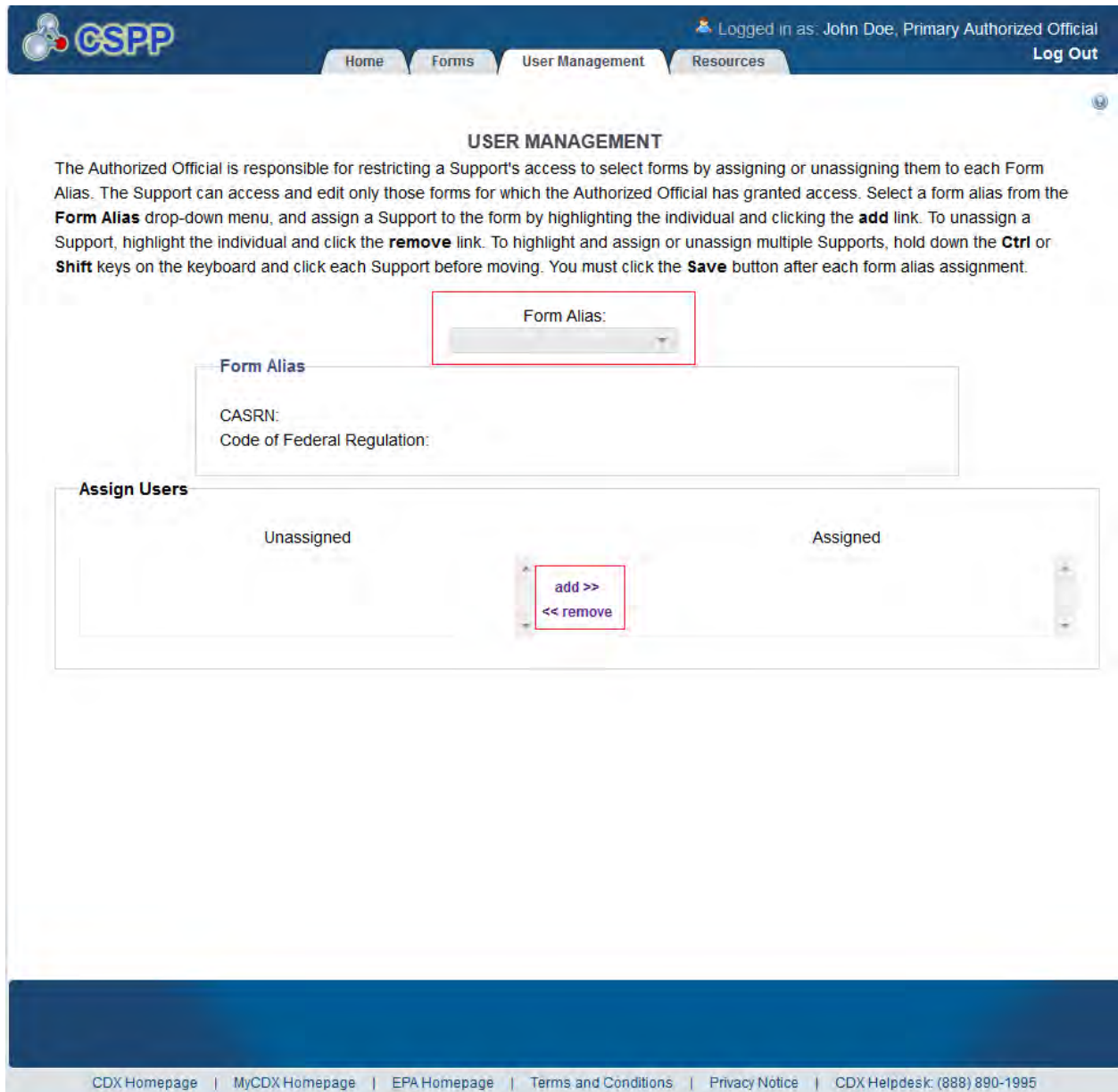
Navigation: Click the 'Forms' tab located within the application header to navigate to the 'Section 8(a) PAIR' forms screen and start a new form.

3.4   Create New Form

As a Primary AO, you can start a new form and assign your Supports to complete the form.

3.4.1   Section 8(a) PAIR Forms Screen

You can access the 'Section 8(a) PAIR' forms screen by clicking the 'Forms' link from the Section 8(a) PAIR 'Home' screen, or by clicking the tab located within the application header.

Only one Section 8(a) PAIR form may be created per form alias. Each column within the table of the 'Section 8(a) PAIR' forms screen can be sorted by clicking the column headers.

Start a New Form: To create a new Section 8(a) PAIR form, select a Code of Federal Regulation (CFR) citation from the 'Submission Type' drop-down menu and click the 'Start New Submission' button. You will be required to create a passphrase that will be associated with that particular form. Make sure to create a passphrase that you will remember, as it cannot be retrieved or reset.

Edit a Form: To modify an existing Section 8(a) PAIR form, click the 'Form Alias' link for a form that has a status of 'In Progress.' You will be required to enter the passphrase associated with that particular form in order to access and continue editing the submission.

Submitted Form: To edit an already submitted Section 8(a) PAIR form (i.e., to create an amendment), you must first unlock that particular form by clicking the 'Lock' icon (🔒) under the 'Action' column. You will be required to enter the passphrase originally associated with the selected form in order to gain access and continue amending the submission. All further changes will be submitted as an amendment. Refer to **Section 8** for further instructions on creating an amendment.

In addition to the 'Form Alias' and 'Status' columns, the 'Section 8(a) PAIR' forms screen displays the following columns:

- **Form Alias:** Displays the form alias. The alias is captured on the 'General Submission Information' screen. The alias helps to differentiate between forms when there are multiple forms.

- **CASRN:** Displays the Chemical Abstract (CA) Services Registry Number (CASRN). The 'CASRN' column will display as blank until you have identified the submission type and started a new form.

- **Status:** Displays the status of the Section 8(a) PAIR form. The column will display values as either 'In Progress' or 'Submitted.

- **Modify Date:** Displays the date the form was last modified.

- **Submission Date:** Displays the date you sent the form to EPA. This date populates only after you submit.

- **Copy of Record:** Click the 'Copy of Record' icon to continue the download copy of record process. The 'Copy of Record' icon is displayed only after you submit to EPA via CDX. The 'Copy of Record' icon is confirmation that your submission has been successfully received by EPA. Note that the 'Copy of Record' icon may take 15-20 minutes to display on the 'Section 8(a) PAIR' submissions screen. Refer to **Section 6** for further instructions on downloading the copy of record.

- **Action:** Displays a 'Delete' icon (❌) for all submissions with a status of 'In Progress.' Displays a 'Lock' icon (🔒) for all submissions that have been submitted. Only an AO can unlock a submission by clicking the 'Unlocked' icon (🔓).

Export options: Displays export options which allow you to export the 'Section 8(a) PAIR' forms screen in the following formats: Comma Separated Values (CSV), Excel, Extensible Mark-up Language (XML), and PDF.

Select Submission Type: Displays the CFR citations that are available for the user to select and create a new form.

Exhibit 3-4 shows a screen capture of the 'Section 8(a) PAIR' forms screen:

Exhibit 3-4: Section 8(a) PAIR Forms Screen

Navigation: Select a CFR from the 'Select Applicable CFR' drop-down menu and click the 'Start New Submission' button to navigate to the 'Create Passphrase' screen.

3.4.2   Create Passphrase Screen

To start a new Section 8(a) PAIR form, select a submission type from the 'Select Applicable CFR' drop-down menu and click the 'Start New Submission' button on the 'Section 8(a) PAIR' forms screen. The 'Create Passphrase' screen allows you to create a passphrase and associate that passphrase with the submission. The application uses the passphrase as an encryption key to

protect the contents of the document. You are responsible for remembering the passphrase and distributing it to the appropriate individuals.

New Passphrase: To associate a passphrase with a submission, enter a passphrase that is at least 8 characters in length. To protect your account, your passphrase should contain a combination of letters and numbers. The passphrase you create may include spaces, but should not contain special characters (for example, +, and *). You can associate the same passphrase with multiple submissions.

You will be responsible for remembering the passphrase and distributing it to only authorized Supports for the form. If you forget the passphrase, you will not be able to access the Section 8(a) PAIR form to print, submit, or make changes.

Exhibit 3-5 shows a screen capture of the 'Create Passphrase' screen:

Exhibit 3-5: Create Passphrase Screen

Navigation: Create a passphrase and click the 'Next' button to navigate to the 'General Submission Information' screen.

3.4.3 Enter Passphrase Screen

To access a form that is in progress, click the 'Form Alias' link for a form with a status of 'In Progress' on the 'Section 8(a) PAIR' forms screen. The 'Enter Passphrase' screen allows you to enter the passphrase that is associated with the form.

Enter Passphrase: Enter the passphrase that you originally created and associated with the form.

Exhibit 3-6 shows a screen capture of the 'Enter Passphrase' screen:

Exhibit 3-6: Enter Passphrase Screen
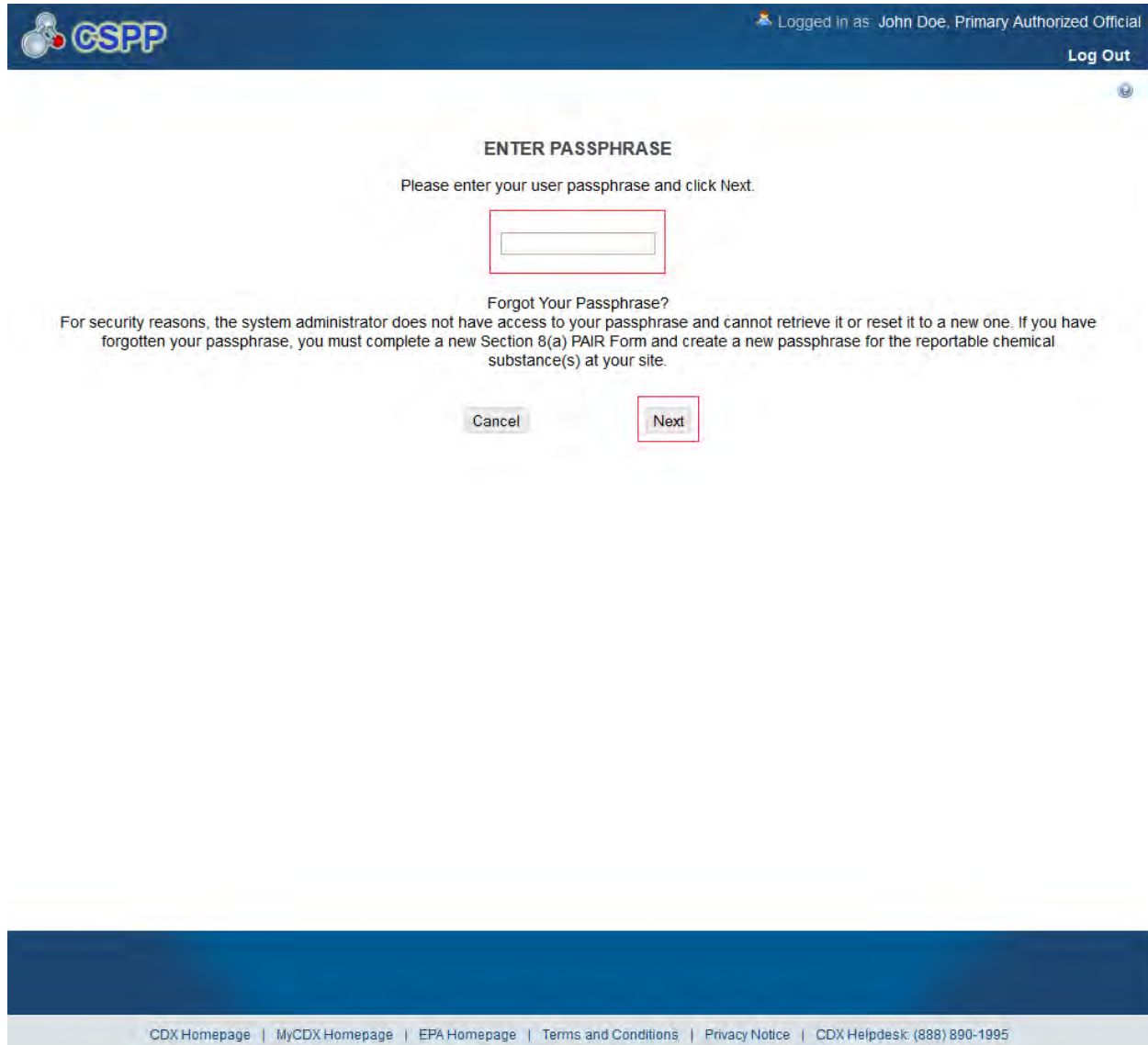
Navigation: Enter the passphrase that you originally created and associated with the form and click the 'Next' button to navigate to the 'General Submission Information' screen.

3.4.4 Navigation Tree

The navigation tree is located on the left side of each screen. You can perform the following functions using the navigation tree:

- **Collapse and Expand folders:** Each section of the submission falls under a collapsible folder within the navigation tree, which allows you to save space or easily view items in the navigation tree. When a folder is expanded, you can click the minus sign (-), the folder icon

( ), or the folder title link to collapse that section of the navigation tree. When a folder is collapsed, you can click the plus sign (+), the folder icon ( ), or the folder title link to expand that section of the navigation tree. When you place your cursor over a folder title link, it will highlight in red.

- **Navigate between screens:** You can use the navigation tree to navigate between the various screens within the application. Each screen of the submission is denoted with a form icon ( ). You can click the form icon ( ) or the screen title link to navigate to the selected screen. You are required to save all information entered on a particular screen before navigating to the next screen or all entered information will be lost. A prompt will appear after you click a link in the navigation tree indicating, 'Are you sure you want to leave the current page? Any unsaved changes will be lost.' If you click the 'OK' button, you will be taken to the requested screen without saving any of the data in the previous screen. If you click the 'Cancel' button, the prompt will close and you will not be taken to the requested screen.

Exhibit 3-7 shows a screen capture of the navigation prompt window:

Exhibit 3-7: Navigation Prompt
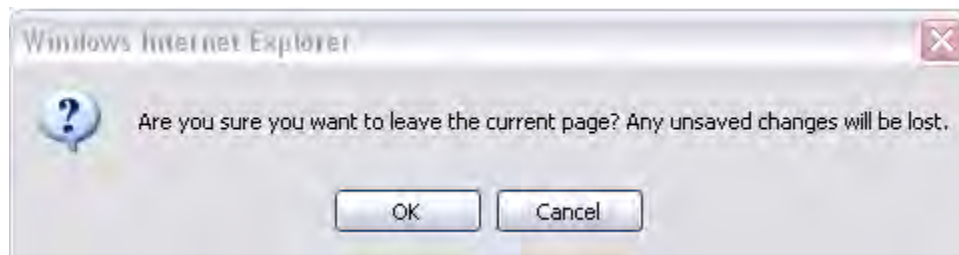
Exhibit 3-8 shows the screen capture of the navigation tree:

Exhibit 3-8: Navigation Tree
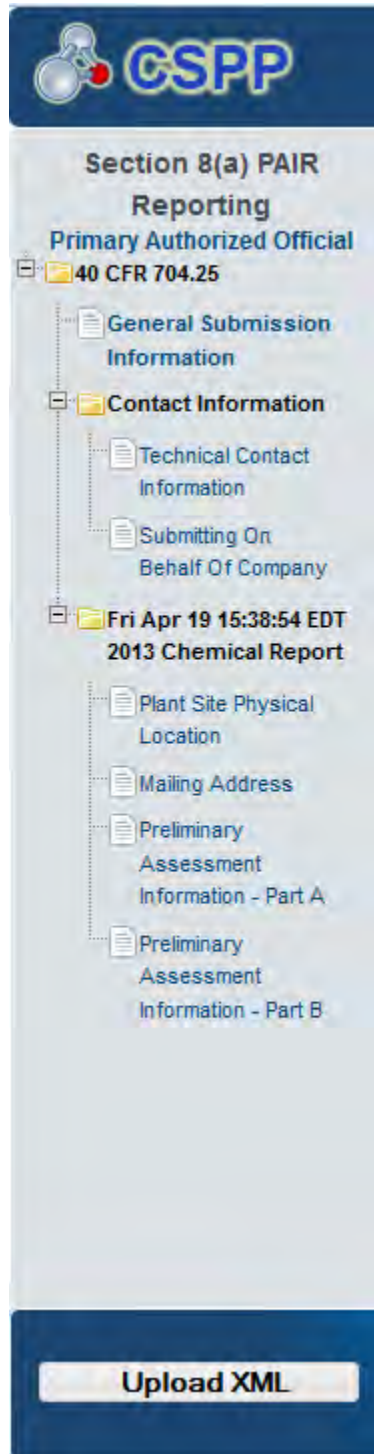
3.4.5 Action Bar

The action bar is located at the bottom of the form section on each screen. You can perform the following functions using the action bar:

- **Validate:** You can click the 'Validate' icon (✓) at any stage of completing a Section 8(a) PAIR form to check for certain types of errors in a submission. A 'Section 8(a) PAIR Validation' pop-up window generates when you click the 'Validate' icon (✓). The 'Section 8(a) PAIR Validation' pop-up window displays a report of all validation errors relating to a failed validation. Refer to **Section 4** for more information on validating a submission.

The following exhibits, Exhibit 3-9, Exhibit 3-10, Exhibit 3-11, and Exhibit 3-12, show the screen captures for the Action Bar:

Exhibit 3-9: Action Bar – Validate

- **Save:** You can click the 'Save' icon (🗐) at any stage of completing a Section 8(a) PAIR Reporting form. After you click the 'Save' icon (🗐), the data entered on the screen will save. The 'Save' function does not validate any data entered.

Exhibit 3-10: Action Bar – Save
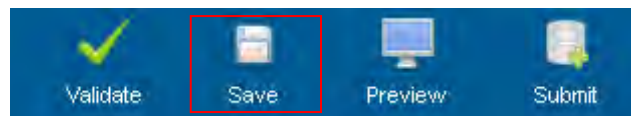
- **Preview:** You can click the 'Preview' icon (🖥) at any stage of completing a Section 8(a) PAIR Reporting form to preview the form. After you click the 'Preview' icon (🖥), a draft watermarked PDF version of the form will generate and display in a separate window.

Exhibit 3-11: Action Bar – Preview

- **Submit:** You can click the 'Submit' icon (🗄) to submit the Section 8(a) PAIR Reporting form after you or the Support have completed all required sections of the Section 8(a) PAIR Reporting form. After you click the 'Submit' icon (🗄), the validation process is initiated. Refer to **Section** 4 for further instructions on validation errors. You can continue with the submission process only after clearing all validation errors. Refer to **Section** 5 for more information on submitting a Section 8(a) PAIR Reporting form.

Exhibit 3-12: Action Bar – Submit

- **Help Links:** You can the help links at any stage of completing a Section '8(a) PAIR Reporting form.

  – If you click the 'CDX Homepage' link, the application navigates you to the CDX Homepage.

  – If you click the 'MyCDX Homepage' link, the application navigates you to the CDX Login.

  – If you click the 'EPA Homepage' link, the application navigates you to EPA Homepage.

  – If you click the 'Terms and Conditions' link, the application navigates you to the CDX Terms and Conditions screen.

  – If you click the 'Privacy Notice' link, the application navigates you to the CDX Privacy and Security Notice screen.

Exhibit 3-13 shows the screen capture of the Action Bar help links:

Exhibit 3-13: Action Bar – Help Links

CDX Homepage | MyCDX Homepage | EPA Homepage | Terms and Conditions | Privacy Notice | CDX Helpdesk: (888) 890-1995

3.5 General Submission Information Screen

You can access the 'General Submission Information' screen by clicking the 'Start New Submission' button on the 'Section 8(a) PAIR' forms screen and creating a new passphrase, or by accessing a Section 8(a) PAIR form that is in progress and entering the passphrase associated with the selected submission.

The 'General Submission Information' screen allows you to select the chemical(s) with which the form is associated by selecting it from the 'CASRN' drop-down menu. The system allows you to edit the form alias associated with the form. If you choose not to edit the form alias, the field will auto-populate with a time stamp containing the date, time, and time zone for when the form was created.

The following fields are displayed on the 'General Submission Information' screen:

- **CASRN:** Displays all available chemicals associated with the CFR citation selected on the 'Section 8(a) PAIR' forms screen. This is a required field.

- **Form Alias:** This field is auto-populated with a time stamp and displays on the 'Section 8(a) PAIR' form screen within the 'Form Alias' column. This field is editable should you choose to provide your own form alias.

Exhibit 3-14 shows the screen capture for 'General Submission Information' screen:

Exhibit 3-14: General Submission Information

Navigation: Select a chemical from the 'CASRN' drop-down menu and click the 'Next' button to navigate to the 'Technical Contact Information' screen. You can also navigate to the 'Technical Contact Information' screen by clicking the 'Technical Contact Information' link located within the navigation tree.

3.5.1   Technical Contact Information Screen

You can access the 'Technical Contact Information' screen by clicking the 'Next' button on the 'General Submission Information' screen or by clicking the 'Technical Contact Information' link within the navigation tree.

The 'Technical Contact Information' screen allows you to submit on behalf of another company. To identify that you are submitting on behalf of another company, the system provides a checkbox for 'This is a submission on behalf of another company.' This functionality has been implemented to accommodate a company that may use an agent or another individual to complete the data entry process for a Section 8(a) PAIR form. If this checkbox is checked, the information regarding the manufacturing or processing establishment on whose behalf the

submission is being made for is to be entered into the 'Submitting on Behalf Of Company' screen.

- **This is a submission on behalf of another company:** Checking the 'This is a submission on behalf of another company' checkbox allows you to identify yourself as an individual submitting on behalf of another company.

- **Copy CDX Registration:** Clicking the 'Copy CDX Registration' button will allow the system to automatically populate the fields with your contact information provided during CDX registration.

- **Prefix:** The 'Prefix' drop-down menu displays all optional prefixes. Captures the technical contact's prefix. If you clicked the 'Copy CDX Registration' button, the fields on the 'Technical Contact Information' screen populate with information entered during CDX registration.

- **First Name:** Captures the technical contact's first name. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Middle Initial:** Displays the technical contact's middle initial. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration.

- **Last Name:** Displays the technical contact's last name. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Suffix:** The 'Suffix' drop-down menu displays all optional suffixes. Captures the technical contact's suffix. If you clicked the 'Copy CDX Registration' button, the fields on the 'Technical Contact Information' screen populate with information entered during CDX registration.

- **Company Name:** Captures the technical contact's company name. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Phone Number:** Captures the technical contact's daytime telephone number; U.S. or international. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Email Address:** Captures the technical contact's email address. The email address must follow the standard email address format: john.doe@abc.com. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Mailing Address 1:** Captures the first line of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Mailing Address 2:** Captures the second line of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration.

- **City:** Captures the city of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **State:** Captures the state of the technical contact's technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field if the 'Country' field is defined as 'United States.'

- **Postal Code:** Captures the postal code of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Country:** Displays all available countries. Captures the country of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

Exhibit 3-15 shows the screen capture of the 'Technical Contact Information' screen:

Exhibit 3-15: Technical Contact Information Screen

Navigation: Click the 'Next' button to navigate to the 'Plant Site Physical Location' screen. If you are submitting on behalf of another company, you are taken to the 'Submitting on Behalf of Company' screen.

3.5.2   Submitting on Behalf of Company Screen

You can access the 'Submitting on Behalf of Company' screen by checking the 'This is a submission on behalf of another company' checkbox and by clicking the 'Next' button from the 'Technical Contact Information' screen. You can also access this screen by clicking the 'Submitting on Behalf of Company' link within the navigation tree.

The 'Submitting on Behalf of Company' screen presents the user with a list of fields that allow you to input contact information for the manufacturing or processing establishment on whose behalf the submission is being made.

- **CBI:** Checking the 'CBI' checkbox allows you to claim contact information as CBI.

- **Prefix:** The 'Prefix' drop-down menu displays all optional prefixes and captures the prefix of the manufacturing or processing establishment contact for which the submission is being made.

- **First Name:** Captures the first name of the manufacturing or processing establishment contact for which the submission is being made. This is a required field.

- **Middle Initial:** Captures the middle initial of the manufacturing or processing establishment contact for which the submission is being made.

- **Last Name:** Captures the last name of the manufacturing or processing establishment contact for which the submission is being made. This is a required field.

- **Suffix:** The 'Suffix' drop-down menu displays all optional suffixes and captures the suffix of the manufacturing or processing establishment contact for which the submission is being made.

- **Company Name:** Captures the company name of the manufacturing or processing establishment contact for which the submission is being made. This is a required field.

- **Phone Number:** Captures the daytime telephone number of the manufacturing or processing establishment contact for whom the submission is being made; U.S. or international. This is a required field.

- **Email Address:** Captures the email address of the manufacturing or processing establishment contact for which the submission is being made. The email address must follow the standard email address format: John.Doe@ABC.com. This is a required field.

- **Mailing Address 1:** Captures the first line of the mailing address of the manufacturing or processing establishment contact. This is a required field.

- **Mailing Address 2:** Captures the second line of the mailing address of the manufacturing or processing establishment contact.

- **City:** Captures the city of the mailing address of the manufacturing or processing establishment contact. This is a required field.

- **State:** Captures the state of the mailing address of the manufacturing or processing establishment contact. This is a required field when 'United States' is selected form the 'Country' drop-down menu.

- **Postal Code:** Captures the postal code of the mailing address of the manufacturing or processing establishment contact. This is a required field.

- **Country:** The 'Country' drop-down menu displays all available countries and captures the country of the mailing address of the manufacturing or processing establishment contact. This is a required field.

Exhibit 3-16 shows the screen capture of the 'Submitting on Behalf of Company' screen:

Exhibit 3-16: Submitting on Behalf of Company Screen

Navigation: Click the 'Next' button to navigate to the 'Plant Site Physical Location' screen.

3.5.3   Plant Site Physical Location Screen

You can access the 'Plant Site Physical Location' screen by clicking the 'Next' button from the 'Submitting on Behalf of Company' or 'Technical Contact Information' screens. You can also access this screen by clicking the 'Plant Site Physical Location' link within the navigation tree.

The 'Plant Site Physical Location' screen provides the name, physical location address, and Dun & Bradstreet Number of the plant site for which data is reported.

- **CBI:** The system allows you to claim the plant site information as CBI by checking the 'CBI' checkbox. Validation will be tied between plant site and parent company for CBI claims. If you claim the plant site information as CBI, but do not claim the parent company information as CBI, the system will display an error message indicating that both the plant site information and the parent company information must have the same CBI claims.

- **Plant Site:** The 'Plant Site' drop-down menu allows you to choose the correct facility for the reported chemical location. The 'Plant Site' drop-down menu values are pre-populated from CDX based on the facilities you have added under 'Manage Facilities' in CDX. If the facilities have been updated in CDX, the drop-down menu will be re-validated and updated. The 'Company,' 'Address 1,' 'Address 2,' 'Email,' 'Phone Number,' 'City, 'State,' and 'Postal Code' fields will populate once a 'Plant Site' facility is selected from the drop-down menu.

- **Dun & Bradstreet:** The system requires you to enter the Dun & Bradstreet number within the 'Dun & Bradstreet' text field. The 'Dun & Bradstreet' text field is validated for the appropriate Dun & Bradstreet format. The Dun & Bradstreet number consists of a 9-digit number in the xx-xxx-xxxx format.

Exhibit 3-17 shows the screen capture of the 'Plant Site Physical Location' screen:

Exhibit 3-17: Plant Site Physical Location Screen

Navigation: Click the 'Next' button to navigate to the 'Mailing Address' screen.

3.5.4 Mailing Address Screen

You can access the 'Mailing Address' screen by clicking the 'Next' button on the 'Plant Site Physical Location' screen. You can also access the 'Mailing Address' screen by clicking the 'Mailing Address' link within the navigation tree.

The 'Mailing Address' screen allows you to enter information regarding the plant site or corporate headquarters. To identify if you are reporting for a plant site or the corporate headquarters, you will choose the appropriate 'Plant Site' or 'Corporate Headquarters' radio button. If you select the 'Plant Site' radio button option, a 'Copy' button becomes available to allow you to populate the information entered on the 'Plant Site Physical Location' 'screen to the

'Mailing Address' screen. The system allows you to claim the 'Mailing Address' screen as CBI by checking the 'CBI' checkbox. If you claim the 'Plant Site Physical Location' as CBI, but do not claim the 'Mailing Address' as CBI, the system will display an error message indicating that both the 'Plant Site Physical Location' and the 'Mailing Address' must have the same CBI claims. The following text fields are available for you to enter information:

- **Plant Site:** Selecting the 'Plant Site' radio button option identifies that the plant site is submitting the Section 8(a) PAIR form. If you select this radio button option, the 'Copy' radio button will display. If the mailing address of the plant site is the same as the plant site physical location, you can click the 'Copy' button to populate the information entered on the 'Plant Site Physical Location' screen.

- **Corporate Headquarters:** Selecting the 'Corporate Headquarters' radio button option identifies that the corporate headquarters is submitting the Section 8(a) PAIR form. If you select this radio button option, the 'Dun & Bradstreet' text field is displayed and is required.

- **CBI:** The CBI checkbox allows you to claim the information entered on the 'Mailing Address' screen as CBI. If you check the CBI checkbox, the 'Plant Site Physical Location' screen must also be claimed as CBI.

- **Copy:** The 'Copy' button displays when you select the 'Plant Site' radio button and it allows you to populate the information entered on the 'Plant Site Physical Location' screen to the 'Mailing Address' screen.

- **Company:** Captures the company name of the plant site or corporate headquarters. This field is required.

- **Mailing Address 1:** Captures the first line of the plant site or corporate headquarters mailing address. This field is required.

- **Mailing Address 2:** Captures the second line of the plant site or corporate headquarters mailing address.

- **City:** Captures the city of the plant site or corporate headquarters address. This field is required.

- **State:** Captures the state of the plant site or corporate headquarters address. This field is required.

- **Postal Code:** Captures the postal code of the plant site or corporate headquarters address. The postal code field will not validate what is entered to correspond with the correct address. Postal code validation only ensures that the correct format is entered. This field is required.

- **Dun & Bradstreet:** The 'Dun & Bradstreet' field displays when you select the 'Corporate Headquarters' radio button and it captures the Dun & Bradstreet number of the corporate headquarters. The system has built-in validation to validate that the Dun & Bradstreet number is entered using the correct Dun & Bradstreet number format. This field is required.

Exhibit 3-18 shows the screen capture for the 'Mailing Address' screen:

Exhibit 3-18: User Mailing Address Screen

Navigation: Click the 'Next' button to navigate to the 'Preliminary Assessment Information-Part A' screen.

3.5.5 Preliminary Assessment Information-Part A Screen

You can access the 'Preliminary Assessment Information-Part A' screen by clicking the 'Next' button on the 'Mailing Address' screen. You can also access the 'Preliminary Assessment Information – Part A' screen by clicking the 'Preliminary Assessment Information – Part A' link within the navigation tree.

The system provides you the ability to upload an XML document to fulfill Section 8(a) PAIR reporting requirements. The system will validate all data pulled from the XML document. Refer to **Section 3.4.13** for additional information.

You are required to complete all fields within the 'Preliminary Assessment Information – Part A' screen. You are also required to enter all data within the 'Preliminary Assessment Information – Part A' screen in kilograms and to the nearest whole number.

Information entered within a CBI field set will be claimed CBI as a whole and not as specific data elements.

If the company reporting is not involved in any manufacturing activity and imports a chemical at one site and processes the chemical at another facility, check the 'This company is not involved in any manufacturing activity and imports a chemical at one site and processes it at another facility' checkbox. If this checkbox is checked, you are required to enter data into the '1. Total Quantity Imported' text field, and proceed to the 'Preliminary Assessment Information – Part B' screen by clicking the 'Next' button.

Item 1 requires you to enter the total quantity of the chemical substance imported in bulk during the reporting period. The transfer of chemical to another site of the same company for processing is treated as if it were for customer use.

Item 2 requires you to enter the total quantity of chemical domestically manufactured for use during the reporting period, not counting the losses reported in item 3d.

The system ensures that the data entered in items 3a through 3c are added correctly, and that the correct mathematical answer is populated in '3d Quantity lost during manufacture.' Items '3a Quantity lost to the environment,' '3b Quantity in wastes treated to destroy the chemical,' and '3c Quantity in wastes not treated to destroy the chemical' require an estimation field where you must specify as a percentage how accurate you believe your estimates are. You must enter an integer value from 0-100%. The system allows you to claim items 1 through 3 as CBI. To claim items 1 or 2 as CBI, you will check the 'CBI' checkbox within the item row. If you check the 'CBI' checkbox for items 3a, 3b, 3c, or 3d, the system is designed to claim all four items as CBI and vice versa.

Items 4 through 7 pertain to activity process categories for the chemical being reported. The system allows you to claim each activity item as CBI by checking the 'CBI' checkbox located next to the activity. By checking the 'CBI' checkbox, all data associated with that activity item is flagged as CBI. The following are descriptions of activity items 4 through 7:

- **4. Manufacture of the Chemical:** This applies to the manufacture of the chemical substance and includes all steps to ready the chemical for further processing use.

- **5. On-Site Use as a Reactant:** This applies to the use of the chemical at the plant site as a reactant in the manufacture of another chemical substance, where the molecular structure of the chemical is altered by breaking chemical bonds or making new chemical bonds between the original substance and some other substance. It is required to report on all processing up to and including the actual reaction step and any ancillary steps that recycle un-reacted chemicals back to the reactor vessel.

- **6. On-Site Nonreactant Use of the Chemical Substance:** This is the quantity of the chemical substance used on site. Examples include cleaning solvents, dielectric fluids, emulsifiers, and lubricants.

- **7. On-Site Preparation of Products:** This is the quantity of the chemical substance processed at the manufacturing site into products for onsite use or sale. All steps up to and including incorporation of the chemical into an article is required for reporting.

Activity items 4-7 require you to describe the manufacturing process and use of the chemical in terms of the number of workers and the quantity of substance associated with the three processing categories; enclosed, controlled release, and open, as described below:

- **Enclosed:** Enclosed processes are designed and operated to prevent intentional release of the chemical.

- **Controlled Release:** Controlled release processes are operated in a controlled manner to minimize the release of the chemical into the workplace.

- **Open:** Open process chemicals are routinely in direct contact with the atmosphere and no measures are taken to prevent release.

Each process category is to be entered using the greatest quantity, in kilograms, processed in each process category. When there is more than one process stream, each process stream is to be calculated separately and then the values added for each process category. If a quantity of the chemical passes in a series through an enclosed process and then passes through an open process, the same quantity would be reported twice, once under each process category. The sum of the quantities entered may be greater than 100% of the total quantity manufactured.

For items 5, 6, and 7, the total quantity processed in all process categories is to be entered in kilograms. The total may be less than the sum of the quantities reported in the individual process categories.

The total number of workers for each process category is to be entered within the 'Total Work' column for items 4 through 7. Workers are counted in a process category if they are directly involved in manufacturing, processing, or handling the chemical during the reporting period, or if they are regularly assigned maintenance or inspection personnel who work with the process from a remote control room. The number of workers and total worker-hours may be listed as zero.

Worker-Hours may be calculated for a given process category by multiplying the average number of full-time employees needed for the operation by the number of hours operating annually.

- **8. Manufacturer's Products:** 'Manufacturer's Products' is encompassed by a CBI field set that allows you to claim that sub-section of the 'Preliminary Assessment Information – Part A' screen as CBI. Visually, you will see only one 'CBI' checkbox, but each element is flagged and stored separately as CBI. Item 8 requires you to report the quantity of the chemical substance prepared for commercial distribution in each of the product types in 8a through 8g. The domestic products are divided into industrial and consumer products. Industrial products are the manufacturing and service industries covered by the North American Industry Classification System codes. Products meant to be used primarily by the

general population are considered to be consumer products. The three types of industrial and consumer products are 'Chemical or Mixture,' 'Article with Some Release,' and 'Article with No Release.'

After all required information is entered into the 'Preliminary Assessment Information – Part A' screen, click the 'Next' button to access to the 'Preliminary Assessment Information – Part B' screen.

The following exhibits, Exhibit 3-19 and Exhibit 3-20, show the screen captures for the Preliminary Assessment Information – Part A:

Exhibit 3-19: Preliminary Assessment Information – Part A Screen Scroll 1

Exhibit 3-20: Preliminary Assessment Information – Part A Screen Scroll 2

Navigation: Click the 'Next' button to navigate to the 'Preliminary Assessment Information-Part B' screen.

3.5.6   Preliminary Assessment Information- Part B Screen

You can access the 'Preliminary Assessment Information – Part B' screen by clicking the 'Next' button on the 'Preliminary Assessment Information – Part A' screen. You can also access the 'Preliminary Assessment Information – Part B' screen by clicking the 'Preliminary Assessment Information – Part B' link within the navigation tree.

The system provides the ability to upload an XML document to fulfill Section 8(a) PAIR reporting requirements. The system will validate all data pulled from the XML document. Refer to **Section 3.4.13** for additional information.

The system requires all data entered within the 'Preliminary Assessment Information – Part B' screen to be entered in kilograms and to the nearest whole number.

The 'Preliminary Assessment Information – Part B' screen retains the same CBI behavior as the 'Preliminary Assessment Information – Part A' screen. All information entered in the 'Part B – Chemical Substance Processing by Customers' section must be accurate within +/-50%.

- **9. Customer Uses and Products:** 'Customer Uses and Products' is encompassed within a CBI boundary box. When you check the 'CBI' checkbox, all data elements within the CBI boundary box are flagged as CBI. The estimated quantity of the chemical substance customers' process for each of the uses listed in items 9a through 9h is to be entered in manually. Any items that cannot be estimated within +/-50% are to be entered into item 9i, 'Unknown Customer Uses.' The system allows you to enter the word 'unknown' if the data would reveal information subject to a confidentiality agreement between the user and the user's customers.

If you report customers' uses as unknown in item 9i, 'Unknown Customer Uses,' for more than 20% of the total quantity of the chemical substances entered within items '1. Total Quantity Imported' and '2. Quantity manufactured for sale or use,' the system requires you to report the market names under which the chemical was distributed in item '10. Market Names.'

- **10. Market Names:** The 'Market Names' section allows you to list each market to which the chemical was distributed within a table. Market names are entered in the text field under the 'Name' column. To add additional market names, click the plus symbol within the 'Actions' column. This allows EPA to gather information about the chemical uses reported as 'unknown' by requiring processors of the products to report directly to the Agency.

- **11. Customer Process Categories:** Item '11. Customer Process Categories' will be displayed as '10. Customer Process Categories' if you did not report more than 20% of the total quantity of the chemical substances entered within items '1. Total Quantity Imported' and '2. Quantity manufactured for sale or use' as unknown in item 9i. The 'Customer Process Categories' addresses the user's general knowledge of the process types customers use to process the chemical. The system will allow you to enter the word 'unknown' if you cannot estimate within +/-50%.

Once you have entered all required information within parts A and B of 'Preliminary Assessment Information,' you are able to submit the Section 8(a) PAIR form.

Exhibit 3-21 shows the screen capture of the ''Preliminary Assessment Information – Part B:

Exhibit 3-21: Preliminary Assessment Information-Part B Screen

Navigation: Answer all of the questions and click the 'Validate' button to navigate to the 'Section 8(a) PAIR Validation' pop-up window or click the 'Submit' button to initiate the submission process.

3.5.7 Upload XML

This section presents the user guide instructions for uploading an XML document. The system provides the ability for the user to upload an XML document to fulfill the reporting requirements for the 'Preliminary Assessment Information – Part A' screen, as well as the 'Preliminary Assessment Information – Part B' screen. The system will validate all data pulled from the XML document form.

3.5.7.1 Upload XML Screen

You can access the 'Upload XML' screen by clicking the 'Upload XML' button located at the bottom of the navigation tree.

The 'Upload XML' screen allows you to upload the necessary XML that will fulfill the reporting requirements for both the 'Preliminary Assessment Information – Part A' screen, as well as the 'Preliminary Assessment Information – Part B' screen.

The following fields are displayed on the 'Upload XML' screen:

- **Upload XML:** Clicking this button will generate a pop-up window that will allow you to select which document you choose to upload.

- **Export XML:** Clicking this link will generate a pop-up window that will allow you to open the uploaded XML or save the file to your computer.

Exhibit 3-22 shows the screen capture for the 'Upload XML' screen:

Exhibit 3-23: Upload XML Screen

Navigation: Click the 'Upload XML file' button to generate a browse pop-up window. Click th9/e 'Export XML' link to view or save the file on your computer. Click any link within the navigation tree to leave the 'Upload XML' screen.

3.6   40 CFR 766

This section presents user guide instructions for the 40 CFR 766 Dibenzodiozins/Dibenzofurans flow of the Section 8(a) PAIR application. Each submission will have a one to one ratio between the chemical and the form that is being submitted to EPA.

3.6.1   General Submission Information Screen

You can access the 'General Submission Information' screen by clicking the 'Start New Submission' button on the 'Section 8(a) PAIR' forms screen and creating a new passphrase, or by accessing a Section 8(a) PAIR form that is in progress and entering the passphrase associated with the selected submission.

The 'General Submission Information' screen allows you to select the chemical with which the form is associated by selecting a chemical from the 'CASRN' drop-down menu. The system

allows you edit the form alias associated with the form. If you choose not to edit the form alias, the field will auto-populate with a time stamp containing the date, time, and time zone for when the form was created.

The following fields are displayed on the 'General Submission Information' screen:

- **CASRN:** Displays all available chemicals associated with 40 CFR 766. This is a required field.
- **Form Alias:** This field is auto-populated with a time stamp and displays on the 'Section 8(a) PAIR' form screen within the 'Form Alias' column. This field is editable should you choose to provide your own form alias.

Exhibit 3-24 shows the screen capture for 'General Submission Information' screen:

Exhibit 3-25: General Submission Information
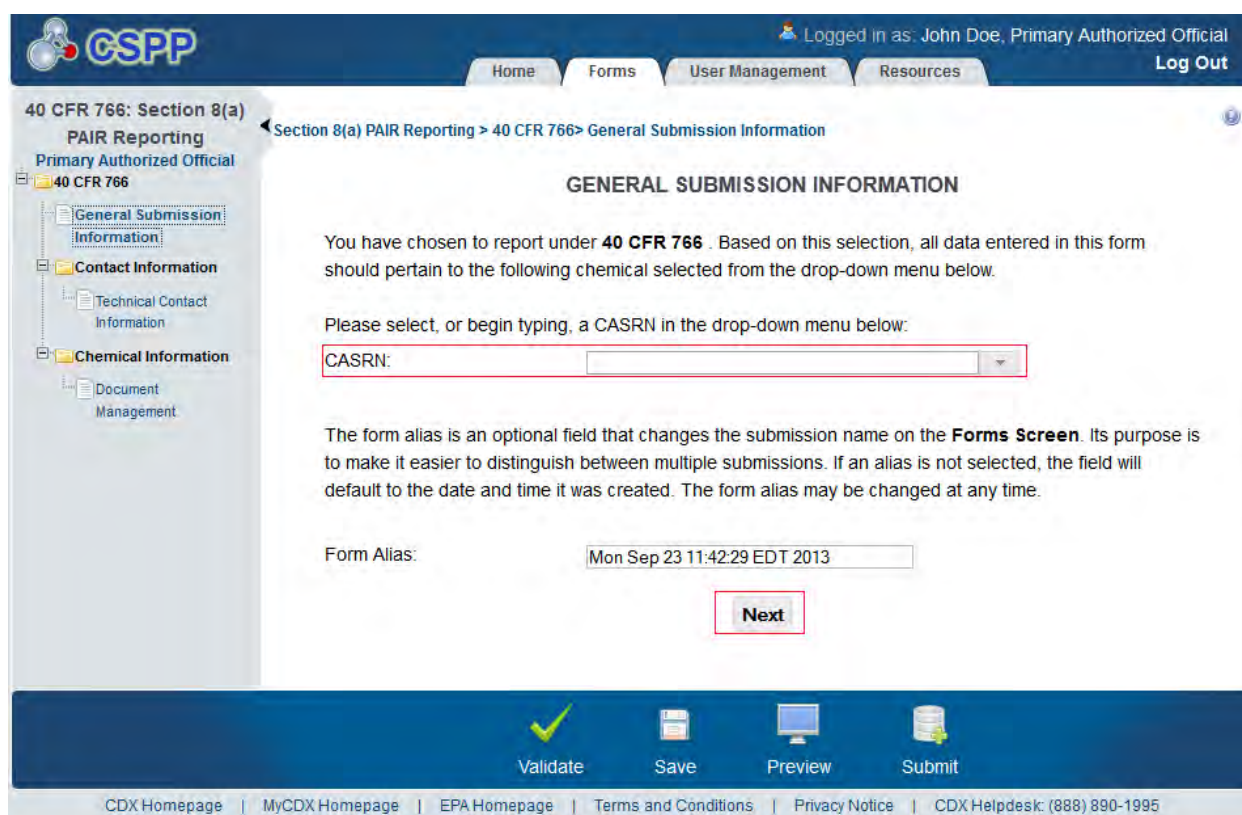
Navigation: Select a chemical from the 'CASRN' drop-down menu and click the 'Next' button to navigate to the 'Technical Contact Information' screen. You can also navigate to the 'Technical Contact Information' screen by clicking the 'Technical Contact Information' link located within the navigation tree.

3.6.2   Technical Contact Information Screen

You can access the 'Technical Contact Information' screen by clicking the 'Next' button on the 'General Submission Information' screen or by clicking the 'Technical Contact Information' link within the navigation tree.

The 'Technical Contact Information' screen allows you to submit on behalf of another company. To identify that you are submitting on behalf of another company, the system provides a

checkbox for 'This is a submission on behalf of another company.' This functionality has been implemented to accommodate a company that may use an agent or another individual to complete the Section 8(a) PAIR data entry process. If this checkbox is checked, the information regarding the manufacturing or processing establishment on whose behalf the submission is being made for is to be entered into the 'Submitting on Behalf Of Company' screen.

- **This is a submission on behalf of another company:** Checking the 'This is a submission on behalf of another company' checkbox allows you to identify yourself as an individual submitting on behalf of another company.

- **Copy CDX Registration:** Clicking the 'Copy CDX Registration' button will allow the system to automatically populate the fields with your contact information provided during CDX registration.

- **CBI:** Checking the ' CBI' checkbox allows you to claim contact information as CBI.

- **Prefix:** The 'Prefix' drop-down menu displays all optional prefixes. Captures the technical contact's prefix. If you clicked the 'Copy CDX Registration' button, the fields on the 'Technical Contact Information' screen populate with information entered during CDX registration.

- **First Name:** Captures the technical contact's first name. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Middle Initial:** Captures the technical contact's middle initial. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration.

- **Last Name:** Captures the technical contact's last name. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Suffix:** The 'Suffix' drop-down menu displays all optional suffixes. Captures the technical contact's suffix. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration.

- **Company Name:** Captures the technical contact's company name. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Phone Number:** Captures the technical contact's daytime telephone number; U.S. or international. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Email Address:** Captures the technical contact's email address. The email address must follow the standard email address format: john.doe@abc.com. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Mailing Address 1:** Captures the first line of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact

Information' screen populate with information entered during CDX registration. This is a required field.

- **Mailing Address 2:** Captures the second line of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration.

- **City:** Captures the city of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **State:** Captures the state of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field if the 'Country' field is defined as 'United States.'

- **Postal Code:** Captures the postal code of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

- **Country:** Displays all available countries. Captures the country of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

Exhibit 3-26 shows the screen capture of the 'Technical Contact Information' screen:

Exhibit 3-27: Technical Contact Information Screen

Navigation: Click the 'Next' button to navigate to the 'Document Management' screen. If you are submitting on behalf of another company, you are taken to the 'Submitting on Behalf of Company' screen.

3.6.3 Submitting on Behalf of Company Screen

You can access the 'Submitting on Behalf of Company' screen by checking the 'This is a submission on behalf of another company' checkbox and by clicking the 'Next' button from the 'Technical Contact Information' screen. You can also access this screen by clicking the 'Submitting on Behalf of Company' link within the navigation tree.

The 'Submitting on Behalf of Company' screen presents a list of fields that allow you to input contact information for the manufacturing or processing establishment on whose behalf the submission is being made.

- **CBI:** Checking the 'CBI' checkbox allows you to claim contact information as CBI.
- **Prefix:** The 'Prefix' drop-down menu displays all optional prefixes and captures the prefix of the manufacturing or processing establishment contact for which the submission is being made.
- **First Name:** Captures the first name of the manufacturing or processing establishment contact for which the submission is being made. This is a required field.
- **Middle Initial:** Captures the middle initial of the manufacturing or processing establishment contact for which the submission is being made.
- **Last Name:** Captures the last name of the manufacturing or processing establishment contact for which the submission is being made. This is a required field.
- **Suffix:** The 'Suffix' drop-down menu displays all optional suffixes and captures the suffix of the manufacturing or processing establishment contact for which the submission is being made.
- **Company Name:** Captures the company name of the manufacturing or processing establishment contact for which the submission is being made. This is a required field.
- **Phone Number:** Captures the daytime telephone number of the manufacturing or processing establishment contact for whom the submission is being made; U.S. or international. This is a required field.
- **Email Address:** Captures the email address of the manufacturing or processing establishment contact for which the submission is being made. The email address must follow the standard email address format: john.doe@abc.com. This is a required field.
- **Mailing Address 1:** Captures the first line of the mailing address of the manufacturing or processing establishment contact. This is a required field.
- **Mailing Address 2:** Captures the second line of the mailing address of the manufacturing or processing establishment contact.
- **City:** Captures the city of the mailing address of the manufacturing or processing establishment contact. This is a required field.
- **State:** Captures the state of the mailing address of the manufacturing or processing establishment contact. This is a required field when 'United States' is selected from the 'Country' drop-down menu.
- **Postal Code:** Captures the postal code of the mailing address of the manufacturing or processing establishment contact. This is a required field.
- **Country:** The 'Country' drop-down menu displays all available countries and captures the country of the mailing address of the manufacturing or processing establishment contact. This is a required field.

Exhibit 3-28 shows the screen capture of the 'Submitting on Behalf of Company' screen:

Exhibit 3-29: Submitting on Behalf of Company Screen

Navigation: Click the 'Next' button to navigate to the 'Document Management' screen.

3.6.4 Document Management Screen

You can access the 'Document Management' screen by clicking the 'Next' button on the 'Technical Contact Information' screen. If you are submitting on behalf of another company, this screen can be accessed by clicking the 'Next' button from the 'Submitting on Behalf of Company' screen. You can also access the 'Document Management' screen by clicking the 'Document Management' link within the navigation tree.

The 'Document Management' screen allows you to upload documents to satisfy reporting requirements for 40 CFR 766. To add documents, click the 'Add Document' button. Clicking the 'Add Document' button generates the 'Document Management' pop-up window.

The 'Document Management' table displays the file name of the document, the date the document was attached, and whether the attached document was claimed as CBI. The system allows you to delete unwanted documents by clicking the 'Delete' icon located under the 'Action' column. Clicking the file name link for a previously attached document generates the 'Document Management' pop-up window. This allows you to view and edit the attached document.

The following items are displayed on the 'Document Management' screen:
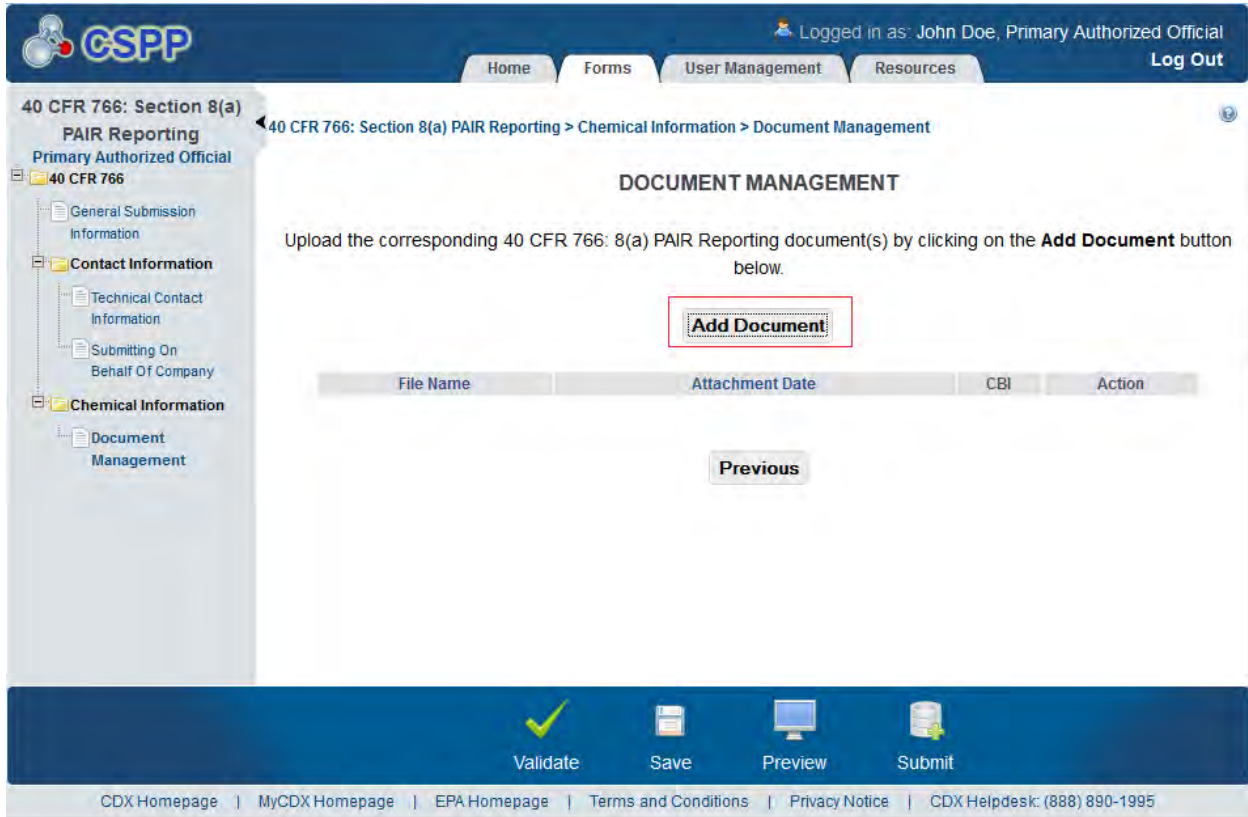
- **Add Document:** Clicking the 'Add Document' button initiates the 'Document Management' pop-up window.

- **File Name:** Displays the name of the attached file. Clicking a file name link of a previously attached document generates the 'Document Management' pop-up window and allows you to view and edit the attached document.

- **Attachment Date:** Displays the date the document was attached.

- **CBI:** Displays the CBI claim for the attached document as either 'Y' or 'N.'

- **Action:** Clicking the 'Delete' icon will delete the specified row and all contents within. A warning message displays to confirm the deletion.

The 'Document Management' pop-up window allows you to browse your hard drive and attach one document at a time. You must click the 'Browse' button to attach the desired document. Clicking the 'Browse' button will initiate the 'File Upload' window on your hard drive. Select the document you wish to attach and click the 'Open' button. To save the attached document to the 'Document Management' screen, click the 'OK' button within the 'Document Management' pop-up window.

If you claim the attached document as CBI by checking the 'CBI' checkbox, you are required to attach the sanitized version of that document. Checking the 'CBI' checkbox will generate the 'Sanitized Document' field. If you claim the attached document as CBI and you do not attach the sanitized version, the system will display an error message indicating that a sanitized document is required.

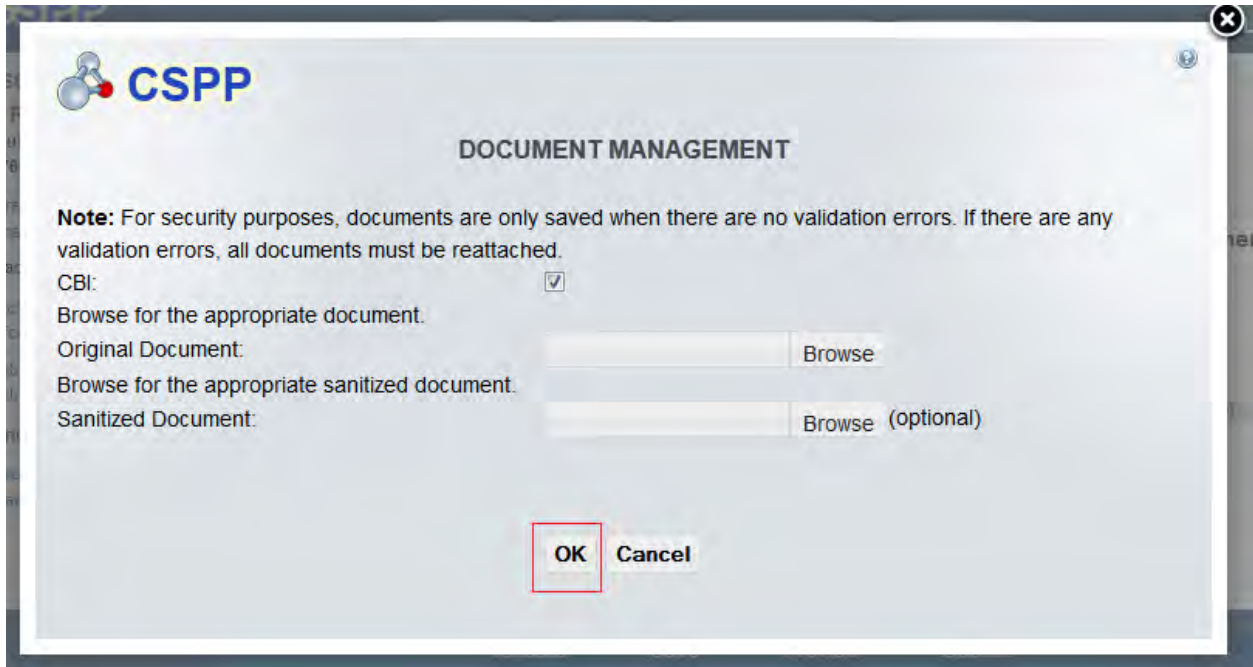Exhibit 3-30 shows the screen capture of the 'Document Management' screen:

Exhibit 3-31: Document Management Screen

Navigation: Click the 'Add Document' button to initiate the 'Document Management' pop-up window.

Exhibit 3-32 shows the screen capture of the 'Document Management' pop-up window:

Exhibit 3-33: Document Management Pop-Up Window

Navigation: Click the 'OK' button to save the attached documents and return to the 'Document Management' screen. Once all documents have been uploaded click the 'Validate' button to generate the 'Section 8(a) PAIR Validation' pop-up window, or click the 'Submit' button to initiate the submission process.

4 Validate

You can click the 'Validate' icon (✔) at any stage of completing a Section 8(a) PAIR. The 'Section 8(a) PAIR Validation' pop-up window is displayed when you click the 'Validate' icon (✔) in the action bar. The 'Section 8(a) PAIR Validation' pop-up window displays a report of all validation errors. During the validation process, the application validates each screen of the Section 8(a) PAIR to find missing and invalid data. For example, if a document is claimed as CBI a sanitized version of the document must be uploaded. If a sanitized version if not uploaded, you will be unable to complete the form.

Validation Errors: Errors are denoted by an error icon (⬤) and can be fixed by clicking the error link. The links will display the *Screen Title Name* (e.g., Mailing Address) and the associated error. After you click a link, the main application screen will display the section where the error occurred so you can easily fix the error. Once you have fixed the error, click the Validate icon (✔) again to refresh the 'Section 8(a) PAIR Reporting Validation' pop-up window. If the information you fixed passes validation, the error will be removed from the 'Section 8(a) PAIR Reporting Validation' pop-up window. You must fix all validation errors in order to successfully submit the submission through CDX.

Warning Messages: Warnings are denoted by a warning icon (⚠) and can be fixed by clicking the warning link. The links will display the *Screen Title* and the associated warning. After you click a link, the main application screen will display the section where the warning occurred so you can easily fix the warning. Once you have fixed the warning, click the 'Validate' icon (✔) again to refresh the 'Section 8(a) PAIR Reporting Validation' pop-up window. If the information you fixed passes validation, the warning will be removed from the 'Section 8(a) PAIR Reporting Validation' pop-up window. You can pass validation and continue to submit to CDX with active warning messages.

You can close the 'Section 8(a) PAIR Reporting Validation' pop-up window by clicking the 'X' button located at the top right of the screen.

Exhibit 4-1 shows the screen captures for the 'Section 8(a) PAIR Reporting Validation' pop-up window:

Exhibit 4-1: Section 8(a) PAIR Reporting Validation Pop-Up Window
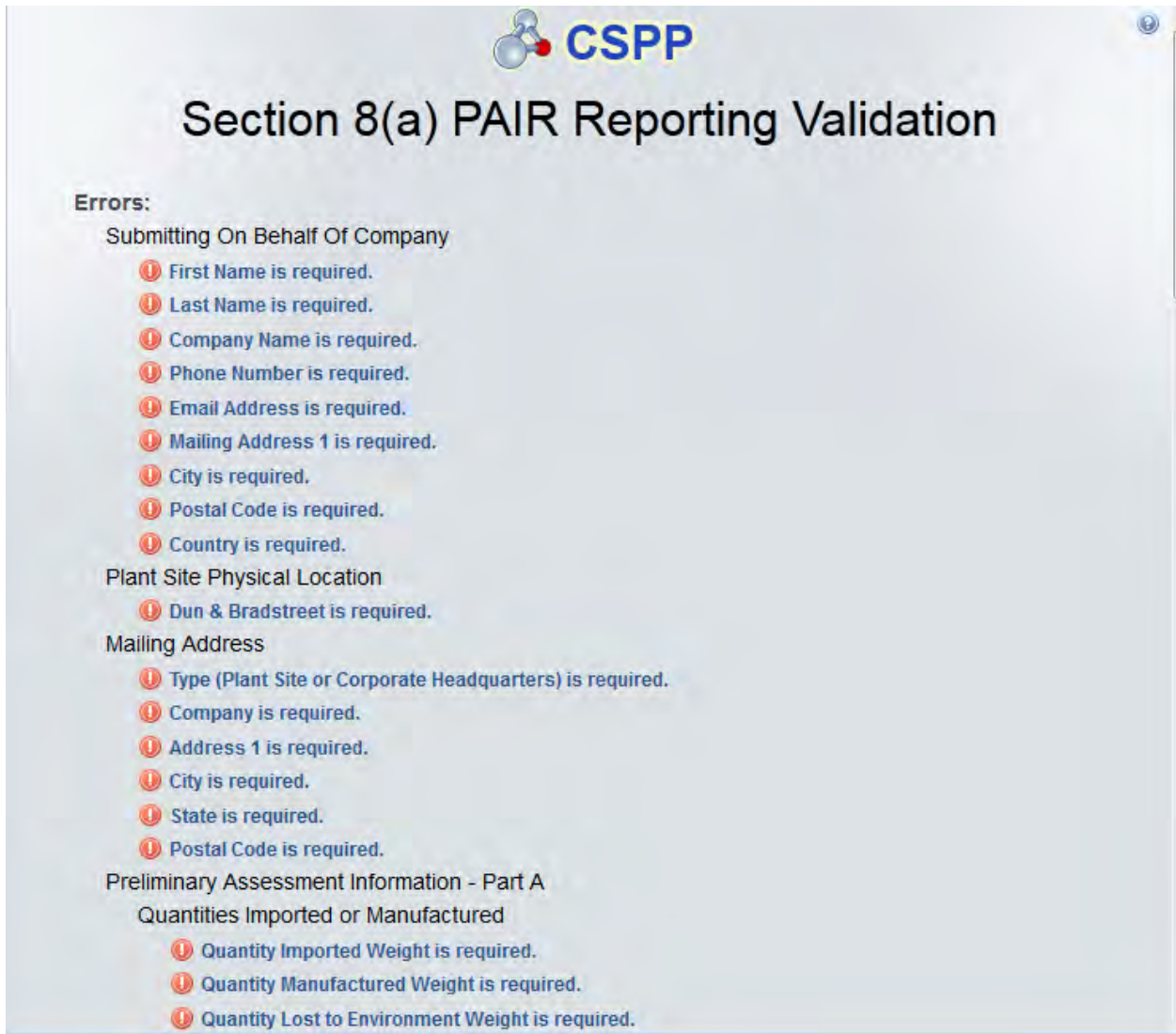
5 Submit to EPA via CDX

As the Primary AO, you have the ability to sign and submit Section 8(a) PAIR submissions to EPA. Any assigned Supports for your submissions do not have access rights to submit to EPA via CDX.

Once you complete all required information and correct all items failing validation, the system will allow you to successfully submit.

5.1 Submitting Official Information Screen

Click the 'Submit' icon ( ) located in the bottom action bar of the Section 8(a) PAIR Reporting application to access the 'Submitting Official Information' screen. This screen is only displayed to the Primary AO upon submission.
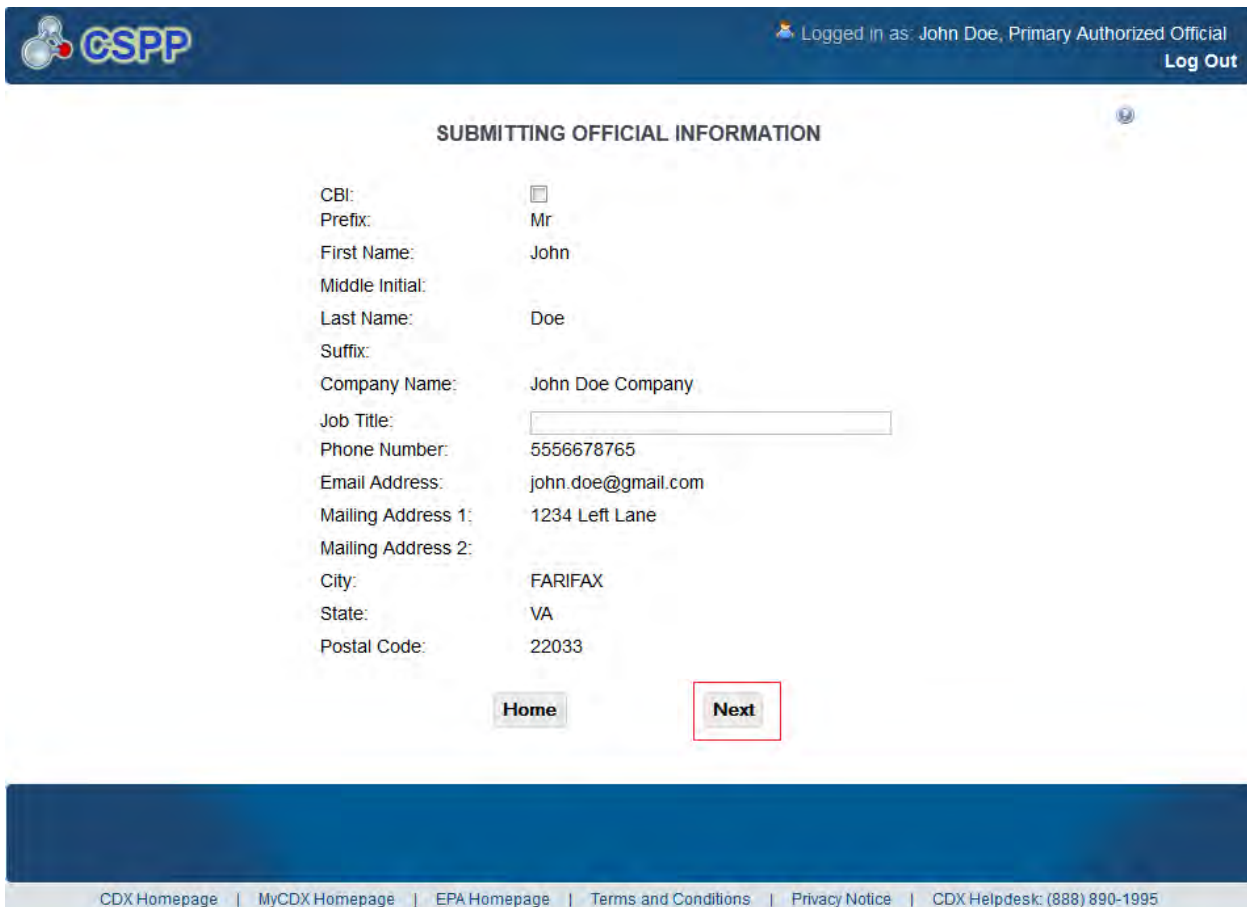
After clicking the 'Submit' icon ( ), the system requires you to review your contact information provided during CDX Registration. The system also requires you to identify your job title.

Exhibit 6-1 shows the screen capture of the 'Submitting Official Information' screen:

Exhibit 5-1: Submitting Official Information Screen

Navigation: Click the 'Next' button to continue with the submission process and proceed to the 'Submission Process: Validation' screen.

5.2   Submission Process: Validation Screen

You can access the 'Submission Process: Validation' screen by clicking the 'Next' button on the 'Submitting Official Information' screen.

The next step in the submission process will validate the information entered within the Section 8(a) PAIR Reporting form. The following exhibit shows the screen capture of the 'Submission Process: Validation' screen:

Exhibit 5-2: Submission Process: Validation Screen

After the Section 8(a) PAIR Reporting form being submitted is verified, a PDF is generated for the user to view.

Exhibit 5-3 shows the screen capture of the 'Submission Process: PDF Generation' screen:

Exhibit 5-4: Submission Process: PDF Generation Screen

Navigation: Click the 'Continue' button to continue the submission process and proceed to the 'Cross-Media Electronic Reporting Regulation (CROMERR) Certification' screen. Click the 'View PDF' button to view a copy of the Section 8(a) Notice submission.

## 5.3   Submit Electronically – CROMERR Certification Screen

You can access the 'Cross-Media Electronic Reporting Regulation (CROMERR)' screen by clicking the 'Continue' button on the 'Submission Process: PDF Generation' screen.

CROMERR provides the legal framework for electronic reporting under all of EPA's environmental regulations.

After clicking the 'Continue' button, the system requires the user to certify that the submission is CROMERR compliant. By clicking the 'I Certify' button on the 'CROMERR' screen, the user authenticates all of the information entered in the submission. Clicking the 'Cancel' button will allow the user to navigate back to the Section 8(a) PAIR Reporting application.

Exhibit 5-5 shows the screen capture for the 'CROMERR Certification' screen:

Exhibit 5-6: CROMERR Certification
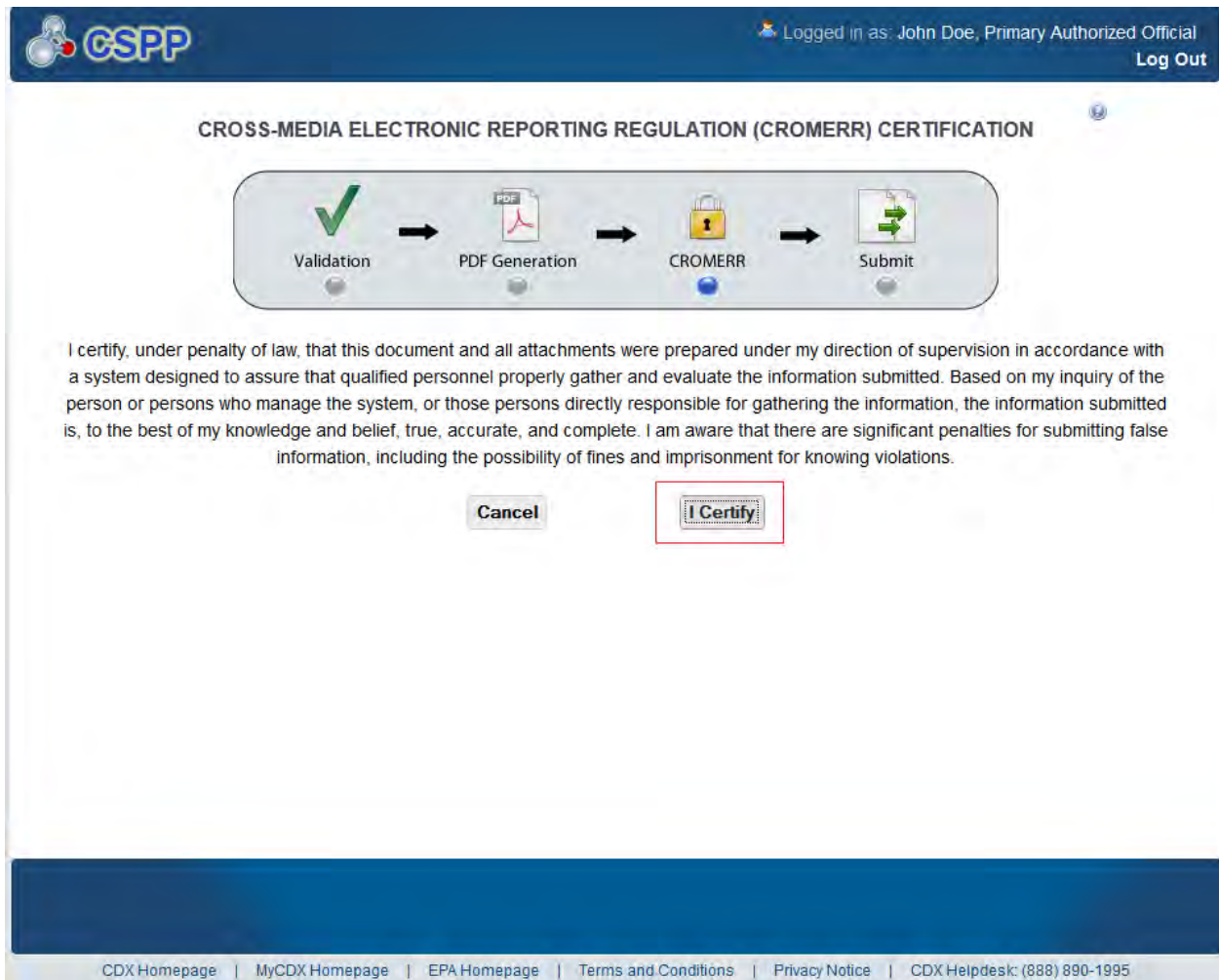
Navigation: Click the 'I Certify' button to continue the submission process and proceed to the 'CROMERR Login' screen.

5.4   Submit– CROMERR Login

You can access the 'CROMERR Login' screen by clicking the 'I Certify' button on the 'CROMERR Certification' screen.

To submit the submission, log in to CDX using the password you provided during CDX registration:

- **Password:** Enter your CDX Registration Password.

Exhibit 5-7 shows the screen capture of the 'CROMERR Login' screen

Exhibit 5-8: CROMERR Login Screen

Navigation: Enter your CDX registration password and click the 'Next' button to navigate to the 'CROMERR Security Question' screen.
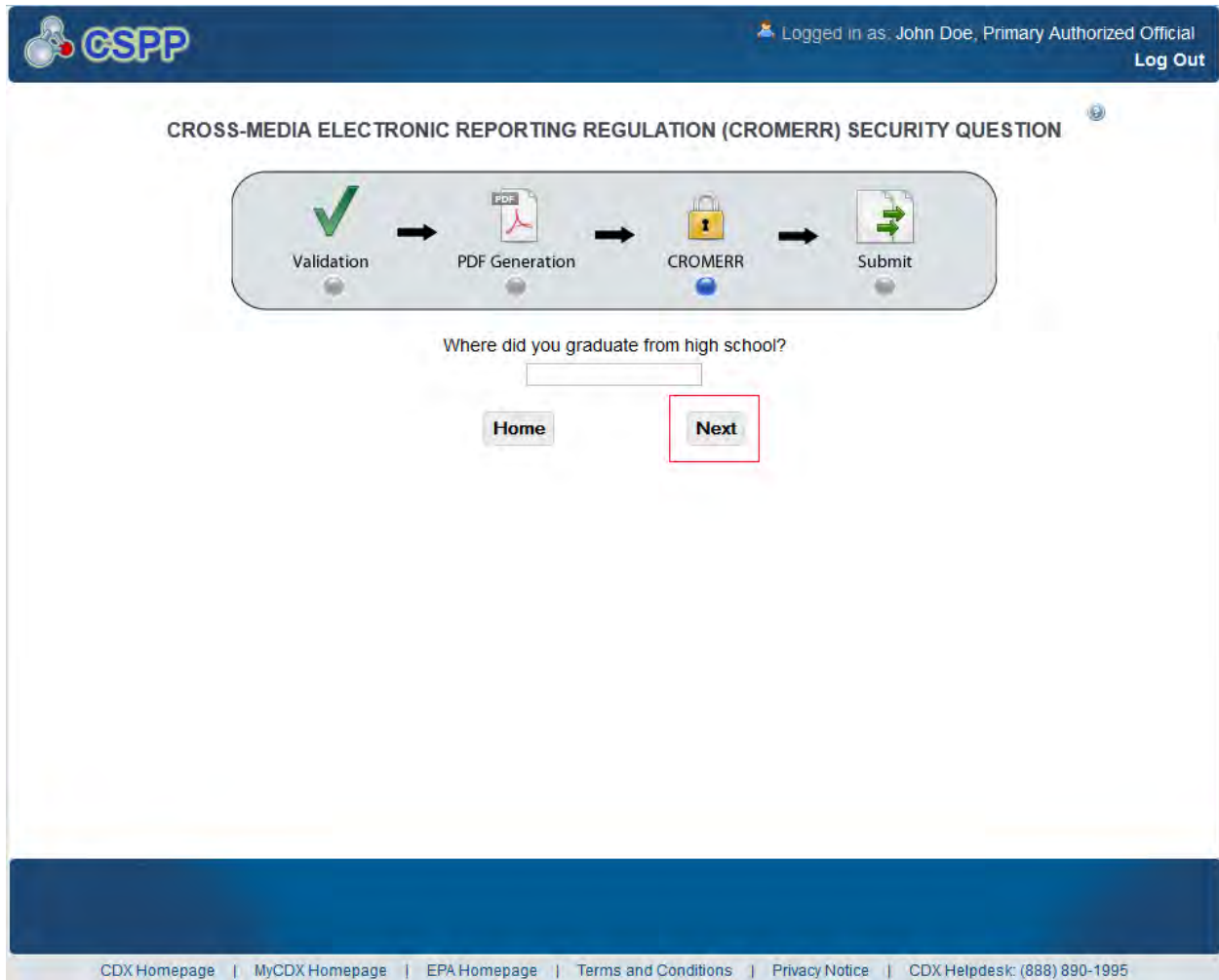
5.5   CROMERR Security Question

You can access the 'CROMERR Security Question' screen by entering your CDX registration password and clicking the 'Next' button on the 'CROMERR Login' screen.

The 'Cross-Media Electronic Reporting Regulation (CROMERR) Security Question' screen randomly selects and displays one of the five CROMERR eSIG-PIN questions that you answered on the 20-5-1 question screen during CDX registration. Answer the CROMERR security question and click the 'OK' button. If your answer was correct, you will be taken to the 'Copy of Record' screen.

Exhibit 5-9 shows the screen capture of the 'CROMERR Security Question' screen:

Exhibit 5-10: CROMERR Security Question Screen

Navigation: Answer the security question and click the 'Next' button to navigate to the 'Submit to CDX' screen.

5.6   Submit to CDX

You can access the 'Submit to CDX' screen after answering the 20-5-1 security question on the 'CROMERR Security Question' screen and by clicking the 'Next' button.

On the 'Submit to CDX' screen, you will see a certification message. Read the message and acknowledge by clicking the 'Confirm' button. Once you have clicked the 'Confirm' button, your submission will be submitted to CDX.

Exhibit 5-11 shows the screen capture of the 'Submit to CDX' screen:

Exhibit 5-12: Submit to CDX Screen

Navigation: Click the 'Confirm' button to navigate to the 'Submission Successful' screen.

5.7   Submission Successful

You can access the 'Submission Successful' screen by acknowledging the certification to submit to CDX by clicking the 'Confirm' button on the 'Submit to CDX' screen.

On the 'Submission Successful' screen, you will see a message indicating the submission has been successfully submitted to CDX.

Exhibit 5-13 shows the screen capture of the 'Submission Successful' screen:

Exhibit 5-14: Submission Successful Screen
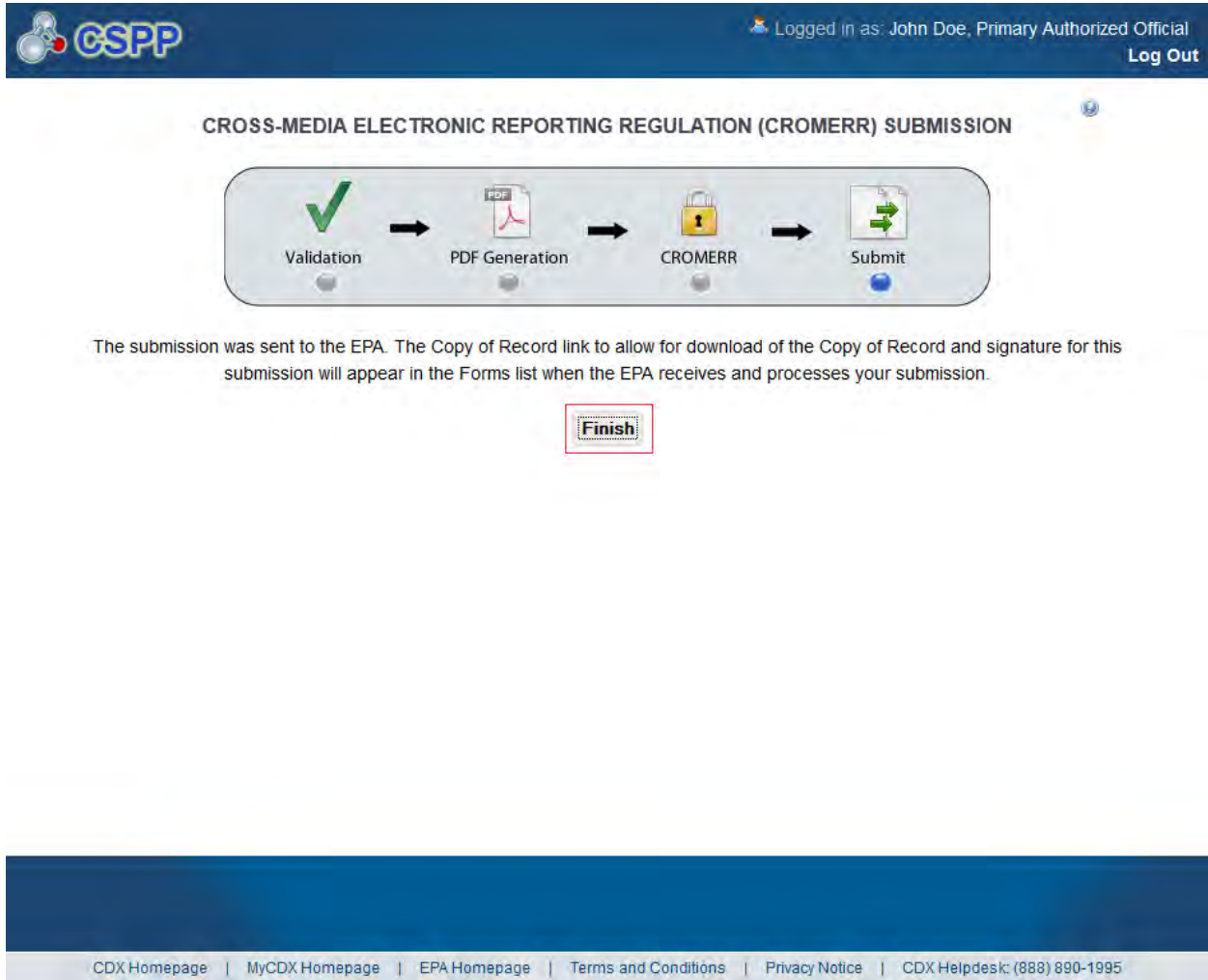
Navigation: Click the 'Finish' button to navigate to the Section 8(a) PAIR Reporting 'Home' screen. Click the 'Forms' link to find your locked submitted form. The 'Section 8(a) PAIR Reporting' forms screen will display the submission with a 'Lock' icon (🔒) under the 'Action' column and will display a status of 'Submitted.'

6 Download Copy of Record

To download a Copy of Record, navigate to the 'Section 8(a) PAIR Reporting' forms screen and locate a form for which you have successfully completed a submission and which has a status of 'Submitted.'

Click the 'Download Copy of Record' icon (⬇) from the 'Section 8(a) PAIR Reporting' forms screen. You will be taken to the 'Enter Passphrase' screen to login into CDX using your CDX passphrase. Note that if you have just submitted your Section 8(a) PAIR Reporting form to CDX that the 'Download Copy of Record' icon (⬇) may take 15-20 minutes to display. Also, you must refresh your forms screen by clicking the refresh button on the address bar of the browser in order for the 'Download Copy of Record' icon (⬇) to display.

Exhibit 6-1 shows the screen capture of the 'Copy of Record' screen:

Exhibit 6-2: Copy of Record Screen

The 'Copy of Record' screen displays the 'File Name' and 'Action' columns in a table format. You can click the 'Actions' button to download zip file containing the PDF version of the submitted form, or the XML version of the Section 8(a) PAIR Reporting submission. When you

click the 'Download Copy of Record' icon ( ), the system will allow you to view or download the individual files that were uploaded during the submission process.

After you click the 'Download Copy of Record' icon ( ), enter the passphrase associated with the submission, and click the 'OK' button, if your login was successful, you will be taken to the 'CROMERR Login' screen. The 'CROMERR Login' screen requires you to enter your CDXweb password. Once you enter your CDXweb password and click the 'Next' button, you will be taken to the 'CROMERR Question' screen. The 'CROMERR Question' screen randomly selects and displays one of the five CROMERR eSIG-PIN questions that you answered on the 20-5-1 Question screen during the initial login to CDX. Answer the CROMERR Security Question and click the 'OK' button. If your answer was successful you will be taken to the 'Copy of Record' screen.

Exhibit 6-3 shows a screen capture of the download prompt screen:

Exhibit 6-4: Download Prompt Screen
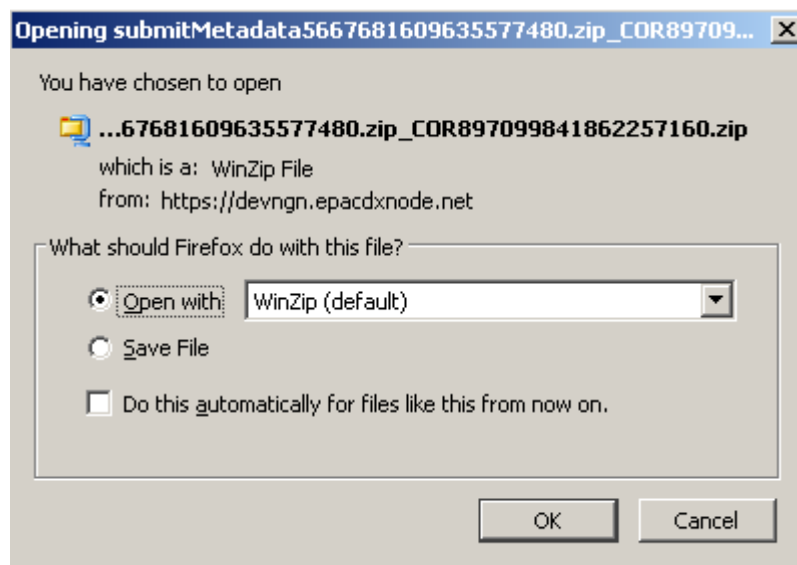
If you click the download arrow icon you will download a zip file that contains the following:

- A PDF version of the Section 8(a) PAIR Reporting submission
- An XML version of the Section 8(a) PAIR Reporting submission

7   Create an Amendment

To amend a submitted Section 8(a) PAIR Reporting form, navigate to the 'Section 8(a) PAIR Reporting' forms screen and locate a form that you previously submitted with a status of 'Submitted.' In addition to displaying a status of 'Submitted' under the 'Status' column, the 'Lock' icon (🔒) will be displayed under the 'Action' column. Click the 'Lock' icon (🔒) under the 'Action' column to start an amendment.

Exhibit 7-1 shows the screen capture of the 'Section 8(a) PAIR Reporting' forms screen:

Exhibit 7-2: Section 8(a) PAIR Reporting Submissions – Amendment

Navigation: After clicking the 'Lock' icon (🔒), you will receive a prompt to confirm the unlock process. If you unlock a submission, you will be able to edit the information within your document. If you do not want to continue with the amendment, click the 'Cancel' button to cancel the amendment process and return to the 'Section 8(a) PAIR Reporting' forms screen. Click the 'OK' button to close the prompt and continue with the amendment.

Exhibit 7-3 shows the screen capture of the 'Unlock Prompt' message:

Exhibit 7-4: Unlock Prompt Message

This will begin the amendment process. Once this submission is unlocked, the only way to lock it again is to resubmit to the EPA. Do you wish to proceed?

[OK]   [Cancel]
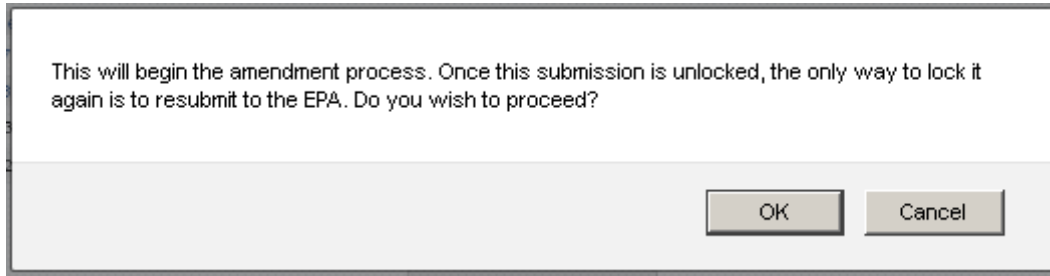
After you click the 'OK' button, you will be taken to the 'Enter Passphrase' screen. You must enter the passphrase originally associated with the form to start the amendment process. After you enter the passphrase and click the 'Next' button you will be taken to the 'General Submission Information' screen. Refer to **Section 3.4.3** for further instructions on the 'Enter Passphrase' screen.

After a submission has been unlocked, the 'Section 8(a) PAIR Reporting ' forms screen will display a status of 'In Progress' under the 'Status' column, and the 'Unlocked' icon (🔓) will display under the 'Action' column; however, you will not see these changes until you navigate back to the 'Section 8(a) PAIR Reporting' forms screen.

8   Resources

You can access the 'Resources' screen by clicking the 'Resources' tab located at the top of the screen at any time during the submission process. You can also access the 'Resources' screen by clicking the 'Resources' link from the Section 8(a) PAIR Reporting 'Home' screen. The 'Resources' screen provides you with links to all of the Section 8(a) PAIR Reporting user guides as well as additional helpful links. Click the 'User Guide' link to access the Section 8(a) PAIR Reporting User Guide document.

- **Section 8(a) PAIR Reporting Homepage:** If you click this link, a new internet browser window will generate displaying the Section 8(a) PAIR Reporting screen.
- **CDX Home:** If you click this link, a new internet browser window will generate displaying the CDX Home screen.
- **TSCA Chemical Substances Inventory:** If you click this link, a new internet browser window will generate displaying the TSCA Chemical Substances Inventory screen.

Exhibit 8-1 shows the screen capture of the 'Resources' screen:

Exhibit 8-2: Additional Information Screen

Appendix A. Definitions, Acronyms, and Abbreviations

The following table displays all the definitions, acronyms, and abbreviations used in this document and their full name.

Definitions, Acronyms, and Abbreviations

Acronym	Full Name
AO	Authorized Official
CA	Chemical Abstract
CASRN	Chemical Abstract Service Registry Number
CDX	Central Data Exchange
CFR	Code of Federal Regulation
CoR	Copy of Record
CROMERR	Cross-Media Electronic Reporting Regulation
CSPP	Submissions for Chemical Safety and Pesticide Programs
EPA	Environmental Protection Agency
OPPT	Office of Pollution Prevention and Toxics
PAIR	Preliminary Assessment Information Rule
TSCA	Toxic Substances Control Act