

**Helpful Hints:**  
**Q and A for Use of the e-TSCA/e-PMN Submission Software**

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US Environmental Protection Agency

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Disclaimer: This Q&A 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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## A. Two Versions of the e-PMN Software

### 1. *Why are there two versions of the e-PMN software?*

EPA is limiting accessibility of e-PMN software that contained the encryption software (FIPS-validated RSA BSAFE Crypto-J) because of Export Administration Act restrictions. Therefore, EPA is making available a more easily accessible version of the e-PMN software that does not contain the encryption portion of the software for use by those submitters who prefer to not submit notices to EPA via CDX during the first two years after the effective date of this rule. This version can also be used by employees to prepare an electronic PMN that can be sent to the authorizing official, who could use the full version of the program to submit the form to EPA via CDX.

### 2. *Where to obtain/download each version of the e-PMN software?*

e-PMN software which includes encryption will be available for download and installation from CDX ([http://cdx.epa.gov/epa\\_home.asp](http://cdx.epa.gov/epa_home.asp)) after a person has registered and has been approved by EPA. The e-PMN software without encryption is available for download and installation on EPA's TSCA New Chemicals website (<http://www.epa.gov/oppt/newchems/epmn/epm-index.htm>).

### 3. *What can each version generate?*

Both versions of the software as stated above contain the same document preparation functionality and generate identical documents. The difference between the two software versions lies with the ability to send documents directly to EPA electronically via CDX. The version containing encrypted software is the only way to submit files to EPA via CDX. This version of the software may also be used for submission of files to EPA via paper and optical disc. The version of the e-PMN software which does not contain the encryption software **may only** be used to submit files to EPA via paper or optical disc or to create draft files which may be **uploaded** for use with the full version of e-PMN software, which does contain encryption software.

### 4. *What is the time table for each submission method of documents to EPA?*

Using the e-PMN software, there are three ways of submitting documents to EPA: by paper, on optical disc, and electronically via CDX. Paper submissions will only be accepted for 1 year after the effective date of the rule (on or before April 6, 2011). Document files on optical disc will only be accepted for 2 years after the effective date of the rule (on or before April 6, 2012). Document files can be submitted electronically as of the effective date of the rule and will become mandatory after 2 years of that date (after April 6, 2012).

## B. How CDX Registration Relates to the e-PMN Software

In order to submit documents electronically to EPA, a person will need to first pre-register with CDX and become approved by EPA. Please read the Q and A for CDX for more information on the registration process.

### 5. *Do I need to register with CDX if I only fill out a submission?*

No, a person does not need to register with CDX to work on a section 5 notice (such as a PMN). A person only needs to register with CDX if he/she plans to submit a document electronically via CDX to EPA. To create a new submission or to work on a current draft submission without registering, the person will need to use the version of the e-PMN software which does not contain the encryption algorithm (found on the New Chemicals website or via a CD containing the software from EPA). Non-registered persons may also prepare finalized submissions and send them via paper or CD to EPA (during the first two years after the effective date of the e-PMN rule).

**6. *Who needs to register with CDX?***

There are two types of persons who will be able to submit documents electronically via CDX: those who are authorized to legally sign the PMN form or other notices (the Authorized Official), and those who are designated and approved by the Authorized Official to submit support documents. Only Authorized Officials and Support Registrants need to register with CDX. Persons who prepare draft versions of Section 5 Notices and Notice supporting documents need not register.

**7. *Who is an Authorized Official and what can he/she submit?***

An Authorized Official is a person in a company legally responsible for the data in the notice submission. This would be the person who signs the certification page on the paper version of the PMN form.

An Authorized Official may submit any Section 5 document to EPA. This includes Section 5 Notices (PMN, SNUN, LVE, TMEA, LoREX, Modifications to LVE and LoREX, Biotechnology, NOC and Letters of Support) and support document to the Section 5 Notices (amendments, test data, and correspondence). Note: Only Authorized Officials may submit Section 5 Notices. 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 and Section II and/or III of the Support form.

**8. *Who is a Support Registrant and what can he/she submit?***

A Support Registrant is a person designated by an Authorized Official to submit supporting documents in 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.

A Support Registrant may submit only support documents to Section 5 Notices (amendments, test data, and correspondence). Note: Only Authorized Officials may submit Section 5 Notices. 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.

## **C. Definitions in Context to the Software**

**9. *Why is the software called e-TSCA in this Q & A, when throughout the rule it is referred to as e-PMN software?***

The software is envisioned as eventually encompassing other TSCA notification and reporting programs besides section 5 PMN or SNUN reporting. For the purposes of this e-PMN

reporting, e-TSCA and e-PMN should be considered the same because e-PMN is the first component of e-TSCA.

#### ***10. What is the structure of a TSCA file?***

There are four file types created by the e-PMN software: PMN (includes exemptions), NOC, Biotechnology and Support. The extensions for these file types are: .pmn\_tsca, .noc\_tsca, .bio\_tsca and .sup\_tsca. These files are actually folders which contain many documents. All file folders contain the xml data and a copy of all attachments. A finalized file folder also contains the sanitized xml as well as pdfs of the original and the sanitized document. When a submission is sent to EPA via CD or CDX, the entire finalized file folder will be sent.

#### ***11. What is an amendment?***

An amendment is a correction or additional information to an original notice for PMN Pages 1-13, MSDS or Physical Chemical properties or to a Biotechnology submission. An amendment may also be submitted for correcting pages in an attachment regarding Fate, Ecotoxicity or Health submitted with the original notice. Complete data sets submitted for Fate, Ecotoxicity or Health endpoints not contained in the original submission should be sent to the EPA as Test Data. For a correction/amendment to a NOC, see the Q & A #13.

#### ***12. What are Test Data?***

Data submitted for Fate, Ecotoxicity or Health endpoints not contained in the original submission and which may be the result of action requested by the Agency should be sent to the EPA as Test Data. To submit test data to the Agency, you will need to create a submission using the "PMN Support Document" module of the e-TSCA/e-PMN software.

#### ***13. What is a mock PMN?***

A mock PMN is an enforcement-related Premanufacturing Notice. For example, if a company had manufactured/imported a chemical in the past and is no longer manufacturing/importing the material and a PMN was not filed in the past for this chemical, the current submission is therefore a "mock" PMN.

#### ***14. What is a Submission Report number?***

The Report Number (found at the top of each submission whether it is a notice submission, NOC, support document or Biotechnology) is a unique value generated by the e-TSCA/e-PMN software for each submission. It is automatically generated (or re-generated) whenever you finalize a project for submission.

This number will be used for tracking purposes by the EPA. It only appears when the submission has been finalized. Therefore, EPA will know if the submission received had passed the validation and was finalized. The Support Document module has the Submission Report Number as one of three tracking numbers which link the support with the original submission (the TS Number and the EPA case number are the other two tracking numbers). Please note that, if the original submission does not have a TS number or an EPA case number, the submitter will need to enter the Submission Report Number in the Support Document header page.

#### ***15. What kind of attachment file types can I add to a submission?***

The list of allowable attachment file types can be found in the main help file in the e-PMN software for the attachment page. The file types are:

\* Chemical Structure files (.mol, .skc) (note: structures may also be displayed in an image file

or PDF file)

- \* PDF files (.pdf)
- \* Powerpoint files (.ppt)
- \* Excel (.xls)
- \* Word documents (.doc)
- \* Rich text documents (.rtf)
- \* Text files (.txt)
- \* Image files (.gif, .jpg, .png, .bmp)

For nucleic acid, amino acid or sequence data submitted for Biotechnology MCANs and TERAs or enzyme related PMNs, the preferred file formats are:

- \*FASTA files (.fas)
- \*GenBank (.gbk)
- \*EMBL (.embl)

## D. Hints on the Preparation of Submissions

### *16. How do I prepare a TMEA submission or a LVE/LoREX modification?*

Some submission types did not previously have a required form. Since industry is familiar with the Premanufacture Notice (PMN) form, EPA has adapted the form to be used for other types of notices. Persons submitting a TMEA or a Low Volume Exemption/Low Release Low Exposure modification will now submit their information using the PMN module. The modification type is marked on PMN page 1 (continued) and the certification statements are checked on PMN page 2. The contact information is filled on PMN page 3. The rest of the modification information can be entered into the form in one of three ways. One way is to fill in the applicable fields in the PMN pages 4-13. Another way is to enter the modification information in the cover letter. The third way to enter the modification information is in an attachment. It should be noted that for modifications, the e-TSCA/e-PMN software does not validate any data beyond PMN page 3. This will allow more flexibility to industry.

### *17. How do I prepare a Biotechnology submission?*

Some submission types did not previously have a required form. In order to accommodate biotechnology submissions, a separate module was created in the e-TSCA/e-PMN software. In the opening screen of the software, choose to create a new project and then select "Biotechnology". You will be required to enter information into the Header Sheet regarding the submitting company and the technical contact. There are 5 choices of Biotechnology submission covered in this module: MCANs, TERAs, Tier I and Tier II exemptions, and Biotechnology TMEAs. After selecting a submission type, the rest of the submission information can be entered in a cover letter and as attachments.

### *18. How do I sanitize the attachments prior to electronic submission?*

All attachments containing confidential business information (CBI) with notices and test data will need to be sanitized. The e-TSCA/e-PMN software **does not** sanitize attachments. The sanitization of attachments will have to be performed outside of the e-PMN software and then added to the file using the software. The submitter may electronically sanitize a document (i.e., use software that can modify the image), or they can sanitize by covering the CBI information on the paper copy and then scanning the sanitized paper copy.



**19. How do I submit amendment information?**

The PMN Support Document module of the e-TSCA/e-PMN software refers to supplemental information for PMN notices and Biotechnology submissions, such as correspondences, amendments and test data. From the opening screen of the e-TSCA/e-PMN software, select to create a new PMN Support Document. Enter the file location and file name to save. Within the Header Sheet, enter at least one of the three identifying fields which will link the support with an EPA case number: the original's Submission Report Number (see Q and A number 14), TS Number or EPA case number. Enter the original submission company information to the extent known. Enter the contact information for the person responsible for the support information. Enter Amendment as the support type. If the support information is being submitted at the request of an EPA employee or a contractor to the EPA, select the check box and enter the person's name in the space provided. The support information can then be entered in two different ways: either by entering the information into the text box provided or by entering the information as an attached file.

**20. How do I send in an amendment for a NOC submission?**

The PMN Support Document module of the e-TSCA/e-PMN software refers to supplemental information for PMN notices and Biotechnology submission such as correspondences, amendments and test data. If a company is asked by EPA to amend a NOC submission, the company should either fill in a new NOC or use their "draft" form of the NOC that was used to file the original submission, make the appropriate changes, re-finalize the form and then resubmit. EPA will note in its tracking system that the first NOC sent to the Agency will constitute the official receipt date of the NOC for that PMN and any subsequent submissions for that PMN number will be considered as amendments.

**21. How do I send in a Joint Submission?**

Because signatures are required by each party of a joint submission, each party will need to complete its own sections of information and submit as two separate notices (note: this requires both parties of the joint submission to register to submit to the EPA if submitting via CDX). The TS number should be the same for each notice. The person sending in the notice should be listed in section 1a and the other party should be listed as the joint submitter in section 1c. Each submission should have a cover letter in which the primary submitter for the chemical is identified and the secondary joint submitter is also identified. Also, due to validation requirements, each joint submitter will need to enter "see joint submitter" in required text fields, add an attachment which says "see joint submitter" for required structure fields, and enter "1" for any required number fields like production volume (and they can attach the "see joint submitter" attachment to the section as an explanation).

**22. How do I submit a Letter of Support?**

If you are a secondary party person submitting information regarding a notice but are not designated as a joint submitter, you will need to complete a Letter of Support. To create a Letter of Support, open the e-TSCA/e-PMN software and select "PMN Support Document". In the Header Sheet, enter the Submission Report Number or TS number for the original submission document (the EPA Case number will not have been assigned yet). Fill in contact information and choose "Letter of Support" as the support type. In section V, enter comments regarding what company requested the information and what information will be supplied in this support submission. Then, either enter the support information completely in section V of the Header Sheet or enter the support information in an attachment. A sanitized version is not required for this type of submission.

**23. How do I indicate that a Letter of Support is needed to make my submission complete?**

Sometimes a secondary party person needs to send in information for a submission to make it complete (e.g., chemical identity information or use information). If chemical identity information is to be supplied in a letter of support, the primary submitter should check the box on the Chemical ID Info header page indicating such and then supply the contact information for the person sending in the Letter of Support. If other information is to be supplied in a letter of support that is not related to the chemical identity, the primary submitter needs to designate in the appropriate fields or as an attachment to sections that the information will be supplied in the letter of support. In both instances, the primary submitter should check the box at the bottom of PMN page 1 continued that says "Mark if Pending Letter of Support". This will alert EPA that information from a secondary source will be coming to complete this submission.

**24. How do I prepare a submission for multi-component chemicals?**

The Premanufacture Notice module of the e-TSCA/e-PMN software is designed to enter one chemical name and one CAS number for each single notice submission. Sometimes, a company wants to submit a set of multi-component chemicals. Multi-component chemicals are two or more similar chemicals that are always present, are not separated, and are generated in the same reaction vessel. Because there is only one field to capture the chemical name and one field to capture the CAS number, the Agency prefers that all chemical names with their CAS numbers (if available) be listed in the chemical name field. This way the chemicals are not separated and potentially lost when capturing the data electronically.

**25. How do I submit a mock PMN?**

To submit a "mock" PMN, use the Premanufacture Notice form and indicate "Mock submission" on Page 1 continued as the Type of Notice.

**E. Software Hints****26. Can I submit via CDX from more than one computer?**

When you log into the CDX portal via the e-TSCA/e-PMN tool by entering your ID and password the first time, a file is copied into the e-TSCA default location (most likely, in the C:\Documents and Settings\username folder and has the extension ".[userid]-cromerr-keystore.jks"). This file contains the key which is needed for encryption and decryption. If you will be logging into the CDX portal from another computer, make sure to copy this file onto the second computer into the corresponding e-TSCA folder location. This will allow the user to decrypt files created with this key.

**27. How do I create/add chemicals to a consolidated submission?**

There are two ways of adding additional pages (chemical ID pages - PMN pages 4, 5 and 6) for a consolidated submission. To generate blank chemical ID pages for a known number of consolidated cases, mark "Yes" at the bottom of PMN page 1 (continued), enter the Pre-communication number (PCN) when prompted, enter the number of chemicals in the consolidated set and select the "Update" button.

Consolidated chemicals may also be generated one at a time, blank or copied from an existing chemical. To generate a blank new chemical, go to the Chemical ID Info screen and

select “Add Chemical” from the software menu or select the shortcut icon from the action bar. To clone or copy information on an existing chemical into a new chemical, select the Chemical ID Info screen on the chemical you would like to copy and then select “Clone Chemical” from the software menu or select the shortcut icon from the action bar.

***28. How do I delete chemicals in a consolidated submission?***

In order to delete a chemical of the consolidated set, select the Chemical ID Info screen for that chemical and select “Delete Chemical” from the software menu or select the shortcut icon on the action bar. If there are only two chemicals in the file and one of them is deleted, the software will automatically change the information on PMN page 1 to remove the consolidation flag. Note that the PC number remains on PMN page 3.

To delete all chemicals except for the first chemical, go to PMN page 1 (continued) and deselect the “Yes this is a consolidated submission” radio button. A warning will appear to say that all extra chemicals will be deleted and then you select “Yes” to delete the extra chemicals.

Please note that when the chemical has been deleted, any attachment associated with the deleted chemical pages remains in the attachment list. To delete these attachments, go to PMN page 12 and remove them from the list.

***29. How do I generate extra PMN pages?***

The e-TSCA/e-PMN software is set up to generate extra pages for PMN pages 7, 8, 9, 10, and 13 as needed. These new pages may be the result of the submission being consolidated or because the company has additional sites or processes. A consolidated submission has separate pages for the chemical ID (PMN pages 4, 5 and 6) but does not need to have separate pages for use, releases and exposures (PMN pages 7, 8, 9, 10 and 13). For those persons who would like additional pages, they can select the PMN page (7, 8, 9, 10 or 13) and then select “Add new copy of the current page” or select “Add cloned copy of the current page” from the software menu. Shortcut icons are also activated on the action bar to add, delete or clone extra pages. Blank extra pages can also be added from any screen by selecting “Insert Page” from the software menu and then selecting which PMN page to add. For consolidated submissions, the company should indicate at the top of the extra page which chemical(s) the data for this screen refers to.

***30. How do I delete extra PMN pages?***

To delete an extra page in the PMN form (PMN page 7, 8, 9, 10 or 13), select the page you want to delete and then select “Delete the Current Page” from the software menu or the shortcut icon on the action bar.

Please note that when the extra pages have been deleted, any attachment associated with the deleted pages remain in the attachment list. To delete these attachments, go to PMN page 12 and remove them from the list.

***31. How do I create a sanitized (non-CBI) copy of the PMN submission?***

If any data is marked CBI in a notice submission, than a sanitized version of the notice must be submitted to the Agency. To view and/or print the sanitized data in the PMN form (pages 1-13), select the icon to “Print a sanitized version of the PMN” and an Adobe file of the PMN form will be generated. Please note that the software does not sanitize attachments; the submitter must attach a pre-sanitized file to the submission when the CBI file is attached. When the submission is finalized, a finalized file is generated which contains both the CBI information and a sanitized

version of the information. This finalized file will be submitted to the Agency (see Q & As #43-45 on the submission process).

**32. *How can I validate the submission?***

The e-TSCA/e-PMN modules have rules for validating the data. The results of the validation appear in a separate window and indicate errors (required validations) or warnings (suggested hints). The data are validated at three different times: when you save the file, when you select the validate icon, and when you finalize the file. There are field level validations, e.g. if a CAS number is entered, the system checks to make sure that it is a valid number. There are also “conditional” level validations, e.g. if the chemical name is marked CBI then a generic name must be provided. Only some of the fielded data in the forms are validated; attachments are not validated.

**33. *How do I add an attachment?***

There are two ways to add an attachment to a submission. One way is to select the attachment page from the navigator on the left and then select “Add” to enter a new attachment. In the Premanufacturing notice module, attachments for MSDS and test data are added this way. The second way to add an attachment in the Premanufacturing module is to add attachments from within various PMN pages. You will either need to select “[Attach File]” where structures or diagrams are often added or select the check box which says “Check here to include an attachment for...” next to various fields or sections.

For paper submissions you need to add the attachment to the list on the attachments page but you do not have to attach the electronic file. Once the attachment is listed on the attachments page, a Header Sheet will be generated when the PDF is created. The header pages need to be included in the submission as the first page of the attachment because it includes codes for proper scanning of the document.

**34. *How do I set up a contact profile?***

Contact profiles containing names, companies, address, phone and email information are stored in a file in the TSCA folder. There are several areas in the e-TSCA/e-PMN software where the stored contact information can be used to populate the contact fields. To create new contact profiles, select “Create/Edit Profile” under the Tools option in the software menu or select the shortcut icon on the action bar.

**35. *How does the system handle field overflow and table overflow?***

The concept of field overflow and table overflow only exists with the paper form. The e-TSCA/e-PMN system is set up so that overflow information is automatically handled. Field overflow prompts the system to generate a continuation page immediately after the PMN page with the complete data given on the continuation page and a note (e.g., See continuation page. id: <P4SB1bC1>) designating which field overflowed in that field. Table overflow prompts the system to check the box at the end of the table which says “Mark (X) this box if the data continues on the next page” and generates an extra page immediate after the PMN page with the data continued in the table on that page. All of these additional PMN pages contain bar codes which enable scanning software to properly identify the data contained on these pages.

**36. *What does it mean when I have a validation error or warning?***

The e-TSCA/e-PMN software has validation rules to standardize information and prevent certain kinds of errors. Many of the validations depend upon the submission type. All

Premanufacturing submission types validate pages 1-3, but only some validate all 13 pages. There are also validations depending upon whether the chemical is a polymer or non-polymer. The results of the validation are found in a second window at the bottom of the screen. In the window, there are two lists: errors and warnings. Errors are required information/formats that must be resolved before the submission can be finalized and submitted. Warnings are suggested issues that are not required. To go to the page where the error/warning is noted, double click on the error/warning.

***37. How does the system handle extra information such as an extra technical contact?***

In order to standardize data amongst all submissions, validations and field data types were established by EPA. Sometimes submitters would like to put data into fields but are restricted from doing so by the software (for example, either they want to put text into a number field or the field is too small). When a submitter encounters this problem, he or she needs to populate the field with something (if it is a required field) and then include in an attachment the different or extra information. Another example would be if the chemical name had a Greek character and the system does not accept a Greek letter. You can create an Adobe file (.pdf) of the full chemical name, include this as an attachment and in the chemical name field, put "See attachment".

***38. How do I indicate CBI in the middle of a large body of text?***

Most of the fields within the e-TSCA/e-PMN software have a CBI box associated with it so that when the CBI box is checked, the entire field is considered to be CBI. There are a few fields indicated in the system where the submitter is able to designate what information is CBI by enclosing the CBI information in curly brackets (i.e. { }). For the most part, the brackets will be used for large bodies of text such as cover letters, the pollution prevention information PMN page 11, and the process description fields on PMN pages 8 and 10. When the curly brackets are used for these indicated fields, the data between the curly brackets will be replaced with "XXX" upon sanitization.

***39. What is the file size limitation of submitting via CDX?***

Sending information via CDX has a few limiting factors. One factor could be that the person may have older technology such as "dial up" and sending a large file may cause the application to time out. Another factor is that CDX has a file size limit; the overall finalized file size needs to be smaller than 80 megabytes in order to submit via CDX.

Some things to try to reduce the size of the attachments are: (1) if the attachment file is an Adobe file, run the OCR Text Recognition function within the Adobe software - this can sometimes reduce the file size 2-5 fold; (2) if the combined total of all attachments makes the finalized file size too large, try sending some of the data files as supporting documents and label them as test data. Make sure to mention in the original submission that you will be sending the files this way.

***40. Why are my total pages different in the sanitized version than in the CBI version?***

Extra pages are created in the CBI version for various reasons. If a continuation page is generated due to a field overflow (the data is too large for the printed page space) and the data is marked CBI, then upon sanitization, the field will no longer need an overflow continuation page and the sanitized version will be one page less.

***41. What happens when I change the CBI status of an attachment?***

If a CBI attachment was added along with the sanitized version of this attachment and the checkmark for the field “Contains CBI Information” is unchecked, the system will warn you that by removing this checkmark, you will be deleting the sanitized file from the attachment list.

***42. How do I enter data if the field validation won't let me?***

In order to standardize the data among all submissions, certain field data types are programmed into the software. If you are having a problem entering information because the field validation will not let you, then for a number field, enter a “0” (if possible), and for a text field, enter “See attachment”. In both instances, add an attachment for further explanation where necessary.

## **F. End Steps for Delivery of Submission to EPA**

***43. What do I need to do in order to submit if I send in my submission via paper?***

When a submission is finalized, the e-TSCA/e-PMN software asks how it will be sent to the EPA. If paper is selected, a finalized version of the form will be saved as a PDF file. You will need to submit one copy of the CBI version along with one copy of the sanitized version or one copy of the non-CBI version. The submitting company's authorized official must sign the paper copy at the bottom of PMN page 2. The e-TSCA/e-PMN tool will print Header Sheets which need to be placed at the front of each attachment. The Header Sheets will contain codes to ensure that the scanning process is correctly performed. Note: the pre e-PMN version of the paper form will not be accepted; the e-TSCA/e-PMN software must be used to generate the finalized PDF for printing and submitting.

***44. What do I need to do in order to submit if I send in my submission via CD?***

When a submission is finalized, the e-TSCA/e-PMN software asks how it will be sent to the EPA. If CD is selected, a finalized version of the file will be saved and another file containing the cover letter and certification pages will be created. You will need to print and complete the certification pages and the company's authorized official must sign the paper copy at the bottom of PMN page 2. The finalized file can then be copied to a CD. The CD and the paperwork must then be sent to the Agency via courier (or hand delivered) to avoid exposure to the mail room security irradiation procedures.

***45. What do I need in order to submit if I send in my submission via CDX?***

When a submission is finalized, the e-TSCA/e-PMN software asks how it will be sent to the EPA. If CDX is selected, a finalized version of the file will be saved and the system will check to see if you are registered and approved to submit with CDX. **Please note that the information provided in CDX Registration must agree with the contact information in the submission document.** If your profile information in the submission does not exactly agree with the data in CDX Registration, then you will be prompted to select which information you would like to have represented in this submission. Your submission will be updated with the selected information before saving and submitting to the Agency.

## **G. Informational**

***46. What has changed between the old form and the new PMN form?***

The print version of the form looks different because it had to be modified for scanning. The information is still found in the same location.

New fields have been added. Some fields were added to capture the information where before the data had been sent to the Agency either in a cover letter or in an attachment. The fields include: pending Letter of Support (PMN page 1 continued) and IES Order number (PMN pages 4 and 5a).

One field which is new (and is often provided in the submission) is the Payment ID number. This number is the user fee payment transaction number, e.g. check number, pay.gov transaction number, or wire number. It will be a required payment number for submissions when a fee applies.

Another new field is the email address. Since the Agency is trying to eliminate paper and paper transactions, the Agency will need the electronic address to make contact with submitters. The email address is not a required field. It should be noted that CBI will not be transmitted from the EPA to the company using email. CBI will only be sent electronically via CDX or paper.

One field has been removed. On PMN page 1 (continued), one of the Type of Notice choices was Intermediate PMN. In the e-TSCA/e-PMN software, to indicate an intermediate PMN, the submitter will choose PMN as the Type of Notice and on the certification page (PMN page 2), the submitter will select the middle User Fee option for Intermediate PMN user fee.

***47. Do I have to submit a NOC or a Supporting Document for an older case by paper?***

Yes. Notice of Commencements and Supporting Documents for Section 5 submissions first received at EPA before the effective date of the rule (April 6, 2010) must be submitted on paper. The e-PMN software restricts finalizing NOCs and supporting documents for designated original submissions prior to 2010 to paper submissions only.

***48. Do I have to use the e-PMN software to create an NOC for an older submission?***

When the rule becomes effective (April 6, 2010), the Adobe version of the NOC form will be removed from the New Chemicals website. Submitters will need to use the new e-PMN software to create Notices of Commencement for all PMNs. NOCs for submissions originally received before April 6, 2010 must be sent via paper.

***49. What are some important things to avoid when using the e-PMN software to submit to the Agency?***

- a. Not using the tool to generate and finalize the submission no matter what method of submitting to the EPA (paper, CD or via CDX).
- b. Not including the tool generated Header Sheets for all attachments when submitting by paper.
- c. Not using a courier or hand delivery of CD submissions.
- d. Not finalizing the submission.

***50. What do I need to register for CDX?***

Any person who wants to send information to the Agency via CDX must first register with CDX and obtain a UserID and password. At the CDX website, you will need to fill in some identification information. Using this information, the e-TSCA/e-PMN Electronic Signature

Agreement form will then need to be printed. In the e-TSCA/e-PMN Electronic Signature Agreement form the electronic signature holder will need to sign and have the signature notarized. Once the form has been completed and returned to the Agency, the account will become active.

***51. For a CDX submission, how do I know if the EPA received my submission?***

By using CDX, the submitter has set up a two-way communication system with the Agency. When a submission such as a notice is sent to the EPA using CDX, the submitter will receive an e-mail notice from CDX to indicate that CDX successfully received the transmission. Next the submitter will receive an e-mail notice from CDX to indicate that the Copy of Record is available for review/download.

***52. How do I get help if I need it?***

The EPA will have a centralized call center number for any issues associated with the software or CDX. Please contact CDX by email at [cdxhelpdesk@itxfc.com](mailto: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.