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Revision Log

| Date | Version No. | Description | Author | Reviewer | Review Date |
|----------|----------------|---|--------|------------|----------------|
| 02/24/16 | 0.01 | Initial Draft of Chemical Data Reporting Primary AO User Guide | C. Yeh | J. Bronick | 02/24/16 |



1 Introduction

This document presents the user guide for the Office of Pollution Prevention and Toxics (OPPT) e-CDRweb tool. The e-CDRweb tool is the electronic, web-based tool provided by the United States (U.S.) Environmental Protection Agency (EPA) for the submission of Chemical Data Reporting (CDR) information. This document is the user guide for the Primary Authorized Official (AO) user of the e-CDRweb tool. User guides are available for the Primary Support and for the Secondary AO and Support at www.epa.gov/cdr.

The e-CDRweb tool allows authorized users to create, modify, and submit the CDR Form U (Form U). As the Primary AO, the tool also allows you to create CDR Form U amendments and download the Copy of Record (CoR). You must submit only one form for each site. Include the required information for all reportable chemicals manufactured (including imported) at that site on the same CDR Form U. If you are the Primary AO for multiple sites, you must create a separate CDR Form U for each site for which reporting is required.

The primary goal of this document is to help the regulated community use the e-CDRweb tool to comply with the requirements of the CDR rule. This document does not substitute for that rule, nor is it a rule itself. It does not impose legally binding requirements on the regulated community or on EPA.

For questions concerning the e-CDRweb tool requirements, please contact the Central Data Exchange (CDX) Help Desk at helpdesk@epacdx.net or call (888)-890-1995 between the hours of 8am – 6pm eastern standard time (EST).

For questions concerning information to be reported using e-CDRweb, please review the guidance and other materials on the CDR website (www.epa.gov/cdr) or contact the CDR team by sending an email to eCDRweb@epa.gov.



2 System Description

To use the e-CDRweb tool, the following are required:

- An e-mail account
- JavaScript enabled web browser with pop-up blocker disabled (see **Section 2.1** for examples)
- Internet access
- Adobe Acrobat Reader 5.0 or higher
- CDX username and password

2.1 Supported Browsers

- Internet Explorer 11 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 (AO) Functions

This section describes how to:

- Access the tool
- Navigate the CDR 'Home' screen
- Assign Supports to complete a CDR Form U
- Complete a CDR Form U
- Upload an (Extensible Markup Language) XML File
- Submit a CDR Form U to CDX
- Download a Copy of Record
- Create an Amendment

The Primary AO is the person legally responsible for the site's CDR submission. The AO, typically, is a senior official for the reporting company and may be the supervisor of the person (or persons) completing the form. This person may be the AO for more than one site.

In some situations, the Primary AO may need to create a joint submission to enable a supplier to provide chemical identity information to EPA. The supplier is the Secondary Submitter and designates its own Secondary AO and Secondary Supports.

As a Primary AO, you can only access the CDR Form U associated with each site for which you registered in CDX. You are the only person who can start a new Primary CDR Form U, reopen a completed form, and electronically sign and submit a Primary CDR Form U. A Secondary AO is the only individual that can start, reopen, and electronically submit a Secondary CDR Form U. You can assign Supports to enter and edit information for a CDR Form U on your behalf.

You can save, and come back to, a CDR Form U at any point during the data entry process and before officially submitting your CDR Form U. The 'Save' functionality allows you to return to the same CDR Form U at any point in the future. You can print the form at any point; however, the 'Not For Submission' watermark will be placed on the document anytime it is printed prior to actual submission. Navigation tips are provided following each screen shot.

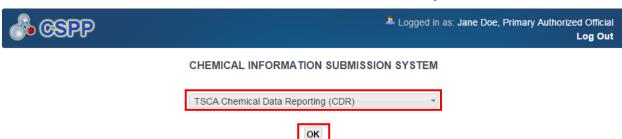
3.1 Log In to the e-CDRweb Tool

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



Exhibit 3 -1 shows a screen capture of the 'Chemical Information Submission System' screen after selecting the "TSCA Chemical Data Reporting (CDR)" option:

Exhibit 3-1: Chemical Information Submission System Screen



The Chemical Data Reporting (CDR) rule requires manufacturers (including importers) to report to EPA information concerning the manufacturing, processing, and use of certain chemical substances listed on the CSPP Chemical Safety and Pesticide Programs. Click OK to complete the CDR form, Form U, using the e-CDRweb software.

The software includes embedded help files and a downloadable user manual to guide you through the CDR submission process. Submit information for all reportable chemical substances at your site in one Form U. Note that a separate CDR submission is required for each reporting site. If you are not reporting on CDR, please select a different application in the drop-down menu.

Paperwork Reduction Act Notice

The annual public burden for this collection of information, which is approved under OMB Control Number 2070-0162, varies depending on the submitter's experience with CDR reporting, and is estimated at 91-139 hours per response for a full report and 26-56 hours per response for a partial report. A full report includes manufacturing, processing, and use information. A partial report includes manufacturing information and does not include processing and use information. According to the Paperwork Reduction Act, "burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For this collection it includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information; and disclosing or providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number. The OMB control number for this collection appears above. In addition, the OMB control numbers for EPA's regulations, after initial display in the final rule, are listed in 40 CFR part 9. Exp.

Navigation: To access the 'Home' screen, select 'TSCA Chemical Data Reporting (CDR)' from the drop-down menu and click the 'OK' button.

3.2 Home Screen Navigation

You can access the CDR 'Home' screen by selecting 'TSCA Chemical Data Reporting (CDR)' from the drop-down menu on the 'Chemical Information Submission System' screen and clicking the 'OK' button.

The 'Home' screen is the first screen within the e-CDRweb tool. It provides you with links and tabs to access the 'CDR Form U Access,' 'User Management,' and 'Resources' screens. To navigate to any of these screens, click the screen link (in blue text) or click the screen tab (located at the top of the screen). The links and tabs provide you with the same functionality.

Primary Authorized Official



- **CDR Form U Access:** To complete a new CDR Form U or modify an existing form, click the 'Form U Access' link or tab to navigate to the 'CDR Form U Access' screen. For additional details about the 'CDR Form U Access' screen, please refer to **Section 3.4.1.**
- **User Management:** To manage the access rights of Supports for each site, click the 'User Management' link or tab to navigate to 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 applicable e-CDRweb user guide, as well as useful links for further guidance on the 'Resources' screen. For additional details about the 'Resources' screen, please refer to **Section 8**.

Exhibit 3 -2 shows a screen capture for the 'Home' screen:

Home Form U Access User Management Resources Log Out

Home Form U Access User Management Resources Log Out

HOME

Welcome to the e-CDRweb application.

Form U Access

Create, modify, or delete a Form U, the form for reporting under TSCA CDR, by clicking the Form U Access tab.

User Management

Manage the access rights of Supports per site. For every Support in each site, the Authorized Official may give him/her the ability to edit (but not create or delete) the form.

Resources

Access a downloadable user guide specific to your user role that describes the e-CDRweb application. Also provides access to websites and other sources for helpful information.

Primary Authorized Official has the ability to create, amend, and unlock forms (parts 1-3). The Authorized Official is the only person who can submit completed forms electronically. Finally, the Authorized Official has the ability to assign Supports to individual sites.

Exhibit 3-2: e-CDRweb Home Screen

Navigation: To access the 'User Management' screen to assign Supports, click the 'User Management' link or tab.

3.3 User Management

On the 'User Management' screen, you can assign one or more Supports to complete or modify a CDR Form U for any of your sites.

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



Select a Reporting Year: Select a reporting year from the drop-down menu to begin assigning Supports. The reporting year must be selected before the tool enables the 'Site' drop-down menu.

Select a Site: Select a site from the drop-down menu to begin assigning Supports. Based on which site you select, the 'Assign Supports' section will update to display only the Supports who have access to that site. If you do not see a list of sites in this drop-down menu, return to CDX and confirm you have added sites to your CDX registration. If you have sites registered to your CDX account and the sites do not appear in this drop-down menu click the 'Refresh Form List' button located on the 'CDR Form U Access' screen.

Assign Supports:

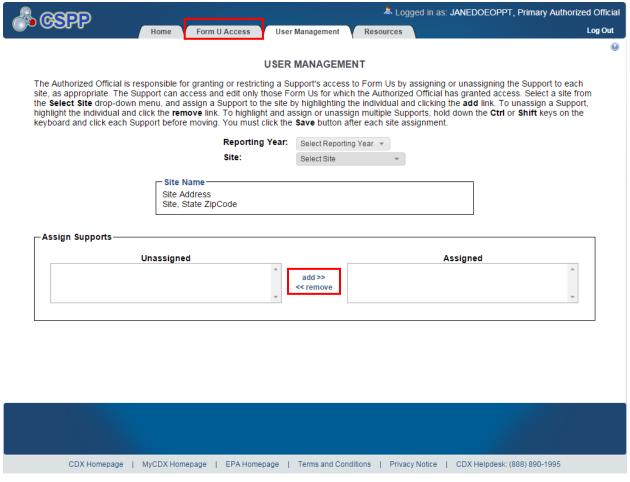
- Unassigned Users: This section shows all the Supports available to you that can be assigned to complete or modify a CDR Form U for the site selected. To move Supports from the 'Unassigned' section to the 'Assigned' section, highlight the individual or multiple Supports and click the 'add>>' link. To 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 in the range.
- Assigned Users: This section shows all the Supports that are assigned to complete or modify a CDR Form U for a single site. To move Supports from the 'Assigned' section to the 'Unassigned' section, highlight the individual or multiple Supports and click the '<< remove' link. 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 in the range.

When you finish assigning Supports, click the 'Save' button to save your selections.



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

Exhibit 3-3: User Management Screen



Navigation: Assign Supports to the CDR Form U and click the 'Save' button. Click the 'Form U Access' link or tab from the 'Home' screen to navigate to the 'CDR Form U Access' screen.

3.4 Complete a CDR Form U

As a Primary AO, you can start a new Form U and designate one or more Supports to complete the form.

3.4.1 CDR Form U Navigation

The 'CDR Form U Access' screen presents you with a list of all the sites you selected during CDX registration. If you do not see a list of sites on this screen, click the 'Refresh Form List' button. If you still do not see a list of sites on this screen, return to CDX and confirm you have added sites to your CDX registration profile.

You can complete one CDR Form U per site. If you have more than one reportable chemical substance at a single site, report the information for all of the chemical substances on one CDR Form U. Each column in the 'CDR Form U Access' screen can be sorted by clicking the column headers.



Start a New CDR Form U: To start a new CDR Form U, click the 'Site' link for a site that has a status of 'Not Started.' You will be required to create a passphrase (see **Section 3.4.2**) that will be associated with that particular CDR Form U. Make sure to select a passphrase that you will remember, as it cannot be retrieved or reset.

Edit an Existing CDR Form U: To modify an existing CDR Form U, click the 'Site' link for a site that has a status of 'In Progress.' You will be required to enter the passphrase associated with that particular CDR Form U in order to gain access to edit the form. Refer to **Section 3.4.3** and **Sections 3.4.7** through **Section 3.4.17** for further instructions on viewing and modifying a CDR Form U.

Edit a Submitted CDR Form U: To edit a submitted CDR Form U (i.e., to make an amendment), you must first unlock the particular CDR Form U with a status of 'Complete' by clicking the lock icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/lock.png" * MERGEFORMATINET () under the 'Action' column. You will be required to enter the passphrase associated with the CDR Form U to gain access to amend the form. After you have made changes to the form, the complete CDR Form U will be submitted as an amendment, replacing the original CDR Form U. Include all information you intend to communicate within the amended form. Refer to Section 7 for further instructions on amending an original CDR Form U.

In addition to the 'Site' and 'Status' columns, the 'CDR Form U Access' screen displays the following columns of information:

- **Reporting Year:** The 'Reporting Year' column displays the reporting year of the site.
- **Address:** The 'Address' column displays the street address of the site.
- **Modify Date:** The 'Modify Date' column displays the date the CDR Form U was last modified.
- **Submission Date:** The 'Submission Date' displays the date you submitted a CDR Form U to EPA via CDX. This date is populated only after you submit a CDR Form U.
- Copy of Record: Click the download arrow icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\ AppData\\Local\\AppData\\Documents and Settings\\sdose\\Local Settings\\Documents and Settings\\ sdose\\Local Settings\\Documents and Settings\\Sdose\\Local Settings\\Temporary Internet Files\\ Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\ eIUR\\images\\down.png" * MERGEFORMAT ♥) to navigate to the 'Copy of Record' screen. You must first enter your passphrase and Cross-Media Electronic Reporting Regulation (CROMERR) login information to gain access to the 'Copy of Record' screen. Click the download arrow icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\AppData\\Local\\AppData\\ Documents and Settings\\sdose\\Local Settings\\Documents and Settings\\sdose\\Local Settings\\Documents and Settings\\sdose\\Local Settings\\Temporary Internet Files\\ Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\sdose\\Documents and Settings\\sdose\\ Desktop\\mockups\\elUR\\images\\down.png" * MERGEFORMAT \$\frac{1}{2}\$) on the 'Copy of Record' screen to download a copy of the submitted CDR Form U to your local hard drive. The download arrow icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\AppData\\Local\\AppData\\ Documents and Settings\\sdose\\Local Settings\\Documents and Settings\\sdose\\Local Settings\\ Documents and Settings\\sdose\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local



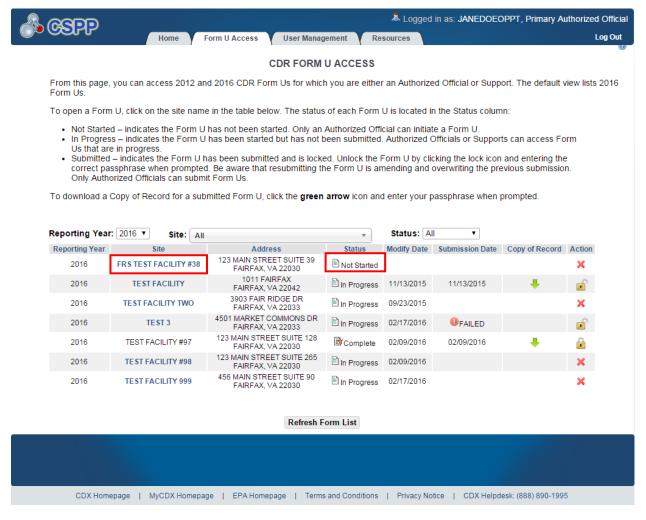
Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\sdose\\Documents and Settings\\sdoon and Settings\\sdo

• **Action:** Click the red X to delete a CDR Form U. Click the 'Lock' icon to edit a submitted form and complete an amendment.



Exhibit 3 -4 shows a screen capture for the 'CDR Form U Access' screen:

Exhibit 3-4: CDR Form U Access Screen



Navigation: Click a 'Site' link for a site with a status of 'Not Started' to navigate to the 'Create Passphrase' screen.

3.4.2 Create Passphrase Screen

The 'Create Passphrase' screen allows you to create and associate a passphrase with a new CDR Form U.

Create New Passphrase: To create and associate a passphrase with a CDR Form U, enter a passphrase that is at least 8 characters in length and does not exceed 20 characters. To protect your account, your passphrase should contain a combination of letters and numbers. The passphrase may include spaces, but should <u>not</u> contain special characters (for example, +, ?, and *). You can associate the same passphrase with multiple CDR Form U's.

You will be responsible for remembering the passphrase and distributing it to only authorized Supports for your site. If you forget the passphrase, you will not be able to access the CDR Form U to print, submit, or make changes.

TDD 9.21 OPPT CIS Chemical Data Reporting User Guide

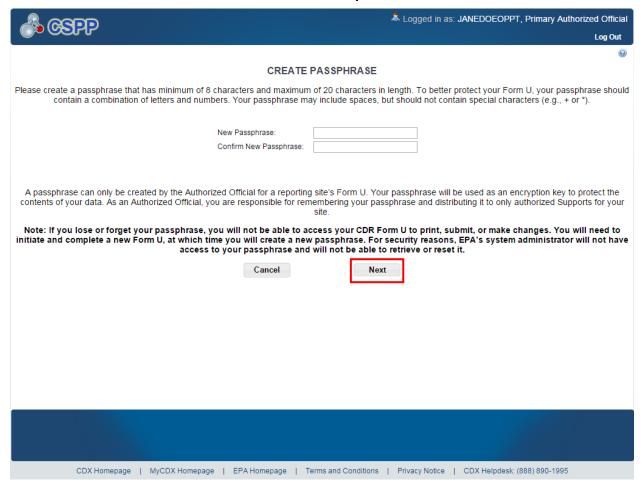
February 24, 2016



For security reasons, the system administrator will not have access to your passphrase and will not be able to retrieve it or reset it to a new one.

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

Exhibit 3-5: Create Passphrase Screen



Navigation: Create a passphrase and click the 'Next' button to navigate to the 'Section 1.A – Parent Company Information' screen.

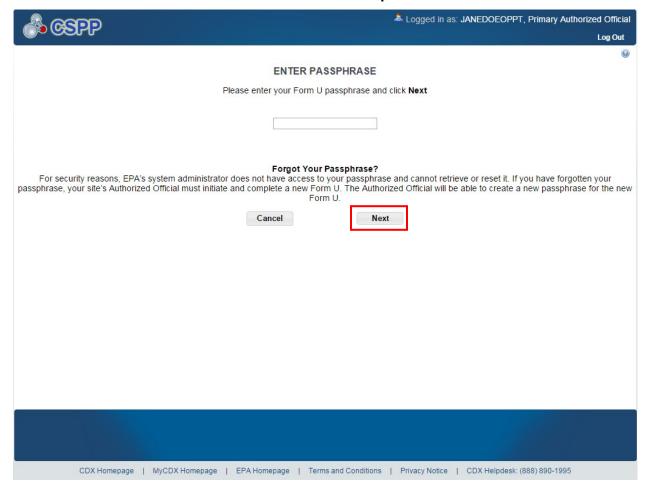
3.4.3 Enter Passphrase Screen

If you have previously created a passphrase for the CDR Form U you are attempting to access, enter the passphrase on the 'Enter Passphrase' screen and click the 'Next' button.



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

Exhibit 3-6: Enter Passphrase



Navigation: Enter the passphrase you created for the CDR Form U and click the 'Next' button to navigate to the 'Section 1.A – Parent Company Information' screen.

3.4.4 Navigation Tree

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

- **Chemical Search:** Each chemical identified within a form displays within the chemical drop-down menu with the associated CASRN.
- Collapse and Expand folders: Each section of the form falls under a collapsible folder in the navigation tree, allowing you to save space and easily view items in the navigation tree. When the folder is expanded, click the minus sign (-), by the folder icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/folder.png" * MERGEFORMATINET [-]), or click the folder title link to collapse that section of the navigation tree. When the folder is collapsed, click the plus sign (+), by the folder icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/folder.png" *

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MERGEFORMATINET [3]), or click the folder title link to expand that section of the navigation tree. When you place your cursor over the folder title link, it will highlight in red.

• Navigate between screens: You are required to save all the information entered on a particular screen before navigating to the next screen or the information will be lost. You can use the navigation tree to navigate between the various screens within the tool and the different sections of the form. Click the 'Save' button to save the information entered within a form when using the navigation tree to move between screens. Click the 'Next' or 'Previous' button to automatically save the information entered on a page. Each section of the form is denoted with a form icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/page_white_text.png" * MERGEFORMATINET (a). You can click either the form icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/page white text.png" * MERGEFORMATINET () or the section title link to navigate between screens. A prompt message 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 choose the 'OK' button, you will be taken to the desired screen without saving any of the data in the previous screen. If you choose the 'Cancel' button, the prompt message will close and you will not be taken further.



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



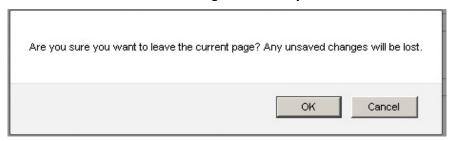
Exhibit 3-7: Navigation Tree





Exhibit 3 -8 shows a screen capture of the navigation prompt:

Exhibit 3-8: Navigation Prompt



- Remove a folder: Each 'Chemical Report' folder within the navigation tree has a 'Remove' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/cross.png" * MERGEFORMATINET X). Click the 'Remove' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/cross.png" * MERGEFORMATINET X) to remove the entire folder and all of its associated sections and information. Note: If you remove a folder, there is no way to retrieve it. You must add a new folder and fill in all corresponding data again.
- **Sort Chemicals by Date (or CASRN, or Name)**: Click the 'Sort Chemicals by Date' button located at the bottom of the navigation tree to sort chemical reports by date. After clicking 'Sort Chemicals by Date,' the option changes to 'Sort Chemicals by CASRN.' After clicking 'Sort Chemicals by CASRN,' the option changes to 'Sort Chemicals by Name.'
- **Add Chemical:** Click the 'Add Chemical' button located at the bottom of the navigation tree to create a new chemical report for another chemical substance. You should choose this option if you have more than one reportable substance at the site for which you are completing the CDR Form U.
- **Add Joint Submission:** Click the 'Add Joint Submission' button located at the bottom of the navigation tree to create a joint submission for a chemical substance, which you may only know by its trade name. See **Sections 3.4.12** and **3.4.13** for more information on joint submissions.
- **Upload an XML File:** Click the 'Upload XML' button to upload an XML file. Refer to **Section 3.4.6** for details about the 'Upload XML' function.
- **Open and Close the navigation tree:** To provide more visual form space, a navigation arrow (◀) that opens and closes the navigation tree is located to the right of the navigation tree. Click the arrow (◀) to close the navigation tree and increase the space of the form content. Click the arrow (▶) on the closed navigation tree to open the 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: Click the 'Validate' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/tick_32.png" * MERGEFORMATINET
 ✓) at any stage during the completion of a CDR Form U. A 'CDR Form U Validation' popup window will display every time you click the 'Validate' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/tick_32.png" * MERGEFORMATINET
 ✓). The 'CDR Form U Validation' pop-up window will display a report of all the warning messages and errors that failed validation. Refer to Section 4 for more information on validating a CDR Form U.

Exhibit 3 -9 shows a screen capture of the action bar showing the 'Validate' icon:

Validate Save Preview Submit

Exhibit 3-9: Action Bar - Validate

• Save: You can click the 'Save' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/save_32.png" * MERGEFORMATINET () at any stage during the completion of a CDR Form U. After you click the 'Save' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/save_32.png" * MERGEFORMATINET (), the data entered on the screen will save. The 'Save' function does not validate any data entered.

Exhibit 3-10 shows a screen capture of the action bar showing the 'Save' icon:



Exhibit 3-10: Action Bar - Save

• **Preview:** Click the 'Preview' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/monitor_32.png" * MERGEFORMATINET _) at any stage during the completion of a CDR Form U to preview the form. After you click the 'Preview' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/monitor_32.png" * MERGEFORMATINET _), a draft watermarked PDF version of the form will generate and display in a separate window.



Exhibit 3 -11 shows a screen capture of the action bar showing the 'Preview' icon:

Exhibit 3-11: Action Bar - Preview



• **Submit:** Click the 'Submit' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/database_add_32.png" * MERGEFORMATINET () to submit the CDR Form U after all sections of the form have been completed by you or a Support. After you click the 'Submit' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/database_add_32.png" *

MERGEFORMATINET , the validation process will be initiated. Refer to **Section 4** for further instructions on validation errors. You can continue with the submission process only after addressing all validation errors. Refer to **Section 5** for more information on submitting a

after addressing all validation errors. Refer to **Section 5** for more information on submit CDR Form U.

Exhibit 3 -12 shows a screen capture of the action bar showing the 'Submit' icon:

Exhibit 3-12: Action Bar - Submit



- **Additional Links:** You can also click any of the additional links, located at the bottom of the page, for helpful information while completing a CDR Form U.
 - If you click the 'CDX Homepage' link, you will be taken to the 'CDX Homepage.'
 - If you click the 'MyCDX Homepage' link, you will be taken to the 'CDX Login.'
 - If you click the 'EPA Homepage' link, you will be taken to the 'EPA Homepage.'
 - If you click the 'Terms and Conditions' link, you will be taken to the 'CDX Terms and Conditions' screen.
 - If you click the 'Privacy Notice' link, you will be taken to the 'CDX Privacy and Security Notice' screen.

Exhibit 3-13 shows a screen capture of the links located below the action bar at the bottom of the screen:

Exhibit 3-13: Action Bar - Links

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

3.4.6 Upload an XML File

You can upload an XML file by clicking the 'Upload XML' button at the bottom left side of the action bar. When you click the 'Upload XML' button, a Windows Explorer pop-up window will be displayed.

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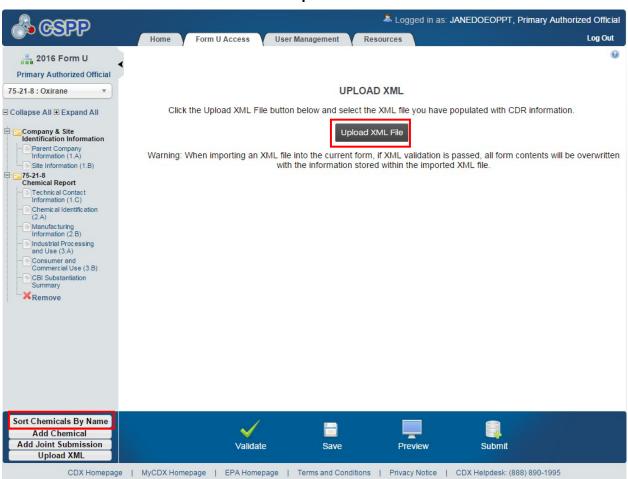
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Exhibit 3-14 shows the screen capture of the 'Upload XML' screen:

Exhibit 3-14: Upload XML Screen



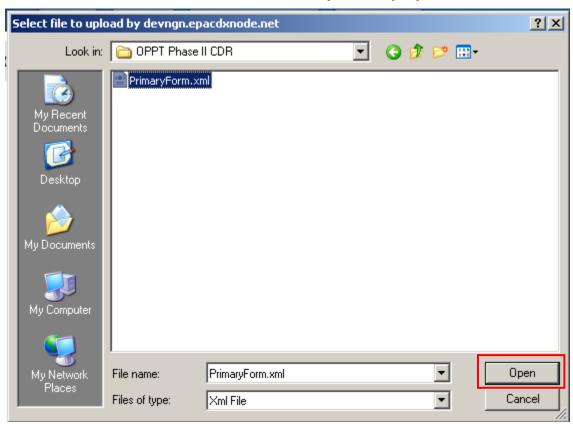


Upload an XML File: Navigate to the location on your computer where you have stored the XML file that you want to upload. Select the XML file from your local hard drive and click the 'Open' button. You will be taken back to the 'Upload XML' screen and the system will process and validate the XML file.



Exhibit 3 -15 shows a screen capture of the Windows Explorer pop-up window:

Exhibit 3-15: Windows Explorer Pop-Up Window



XML Validation: If the upload is successful, you will be taken to the 'Upload XML Successful' screen. From the 'Upload XML Successful' screen, click the 'OK' button to navigate to the 'Home' screen.

If you upload an XML file that is not consistent with the e-CDRweb schema, you will receive a message indicating that the document did not pass validation.

Access the CDR Form U: To view your CDR Form U after uploading the XML file, click a link within the navigation tree of the CDR Form U to begin editing the form.

Submit the CDR Form U: To submit the CDR Form U, click the 'Submit' icon (INCLUDEPICTURE

"http://devngn.epacdxnode.net/cdx-oppt-iur/images/database_add_32.png" * MERGEFORMATINET () located in the bottom action bar. Refer to **Section 5** for more details about the submit functionality.

3.4.7 Section 1.A - Parent Company Information

To access the 'Section 1.A - Parent Company Information' screen, click a 'Site' link from the 'CDR Form U Access' screen and create or enter the passphrase associated with a particular CDR Form U.



The **Parent Company Name** and the **Parent Company Address** fields will be pre-populated from what you entered during CDX registration. If the information displayed here is incorrect, return to CDX and update your organization information. If your organization differs from your parent company (such as in the case of a subsidiary), you can edit the information on this screen by checking the "Check this box if your parent company differs from the organization you registered under in CDX, and edit the information on this page" checkbox to make the fields on this screen editable. Un-checking this checkbox will cause the information on this screen to default back to the parent company information entered during CDX registration.

Parent Company Dun & Bradstreet Number (1.A.2): You will be required to enter a 9-digit Dun & Bradstreet (D&B) number associated with the parent company name.

For more information on obtaining a D&B number, see www.dnb.com/us. If you are already listed with D&B, but do not know your number, you can call (800)-234-3867 for assistance.

Exhibit 3 -16 shows a screen capture of the 'Section 1.A - Parent Company Information' screen:



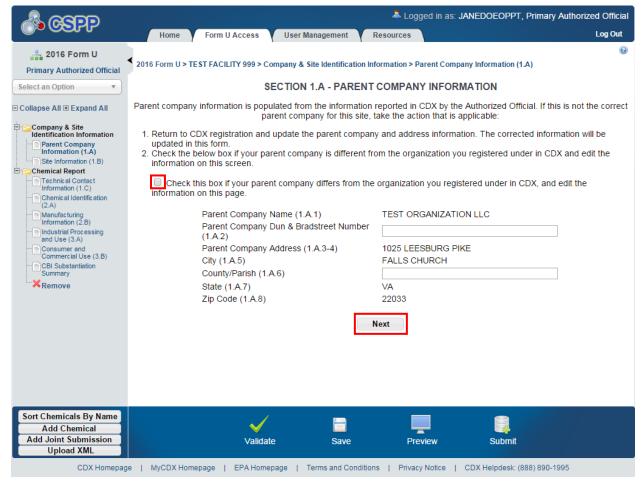


Exhibit 3-16: Section 1.A - Parent Company Information Screen

Navigation: Click the 'Next' button to navigate to the 'Section 1.B - Site Information' screen. You can also access this screen by clicking the 'Site Information (1.B)' link from the navigation tree.

3.4.8 Section 1.B - Site Information

You can access the 'Section 1.B - Site Information' screen by entering the parent company information and clicking the 'Next' button from the 'Section 1.A – Parent Company Information' screen. You can also access this screen by clicking the 'Site Information (1.B)' link from the navigation tree.

The **Site Name** and the **Site Address** fields will pre-populate from what you entered during CDX registration. You will be required enter only the 'Site Dun & Bradstreet Number' and County/Parish information. If any of the information displayed here is incorrect, return to CDX and update your facility information.

Site Dun & Bradstreet Number (1.B.2): You will be required to enter a 9-digit D&B number associated with the site company name.



County/Parish: A County/Parish value is required to be entered and associated with the site company name.

For more information on obtaining a D&B number, see www.dnb.com/us. If you are already listed with D&B, but do not know your number, you can call 1-800-234-3867 for assistance.

Exhibit 3-17 shows a screen capture of the 'Section 1.B - Site Information' screen:

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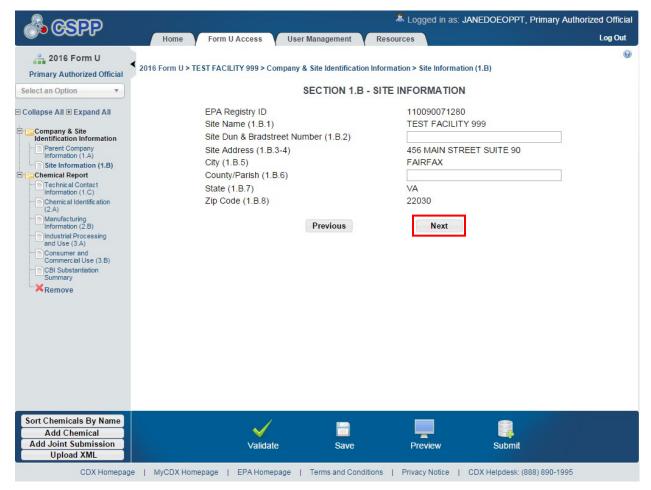


Exhibit 3-17: Section 1.B - Site Information Screen

Navigation: Click the 'Next' button to navigate to the 'Section 1.C – Technical Contact Information' screen. You can also access this screen by clicking the 'Technical Contact Information (1.C)' link from the navigation tree.

3.4.9 Section 1.C - Technical Contact Information

You can access the 'Section 1.C – Technical Contact Information' screen by clicking the 'Next' button from the 'Section 1.B – Site Information' screen. You can also access the 'Section 1.C – Technical Contact Information' screen by clicking the 'Technical Contact Information (1.C)' link from the navigation tree.

The technical contact should be a person who can answer questions about the reported chemical substance(s). Typically, a person located at the manufacturing site is best able to answer such questions; however, you may use your discretion in selecting a technical contact or multiple technical contacts. When selecting a technical contact, consider that EPA may have follow-up questions about a CDR submission, one or more years after the submission date. The technical contact need not be the person who signed the certification statement.



You can assign one technical contact per chemical substance and one per 'Trade Product Name' in a joint submission. Because there can be multiple technical contacts, each associated with a different chemical substance, you can either create a new technical contact, choose an existing technical contact, or modify an existing technical contact.

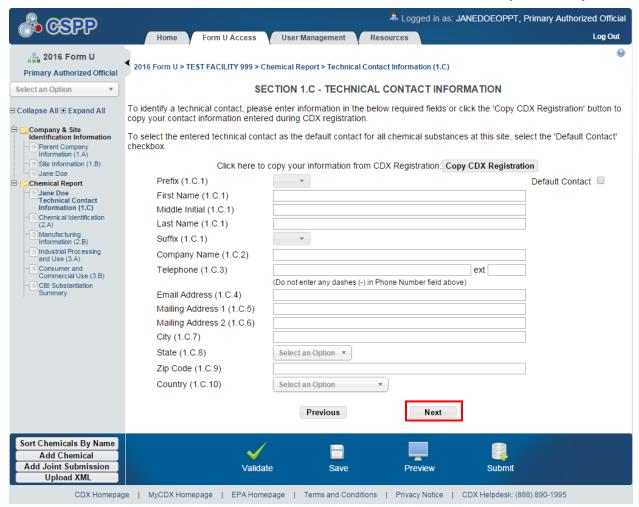
Creating a Technical Contact: When you first access the 'Section 1.C – Technical Contact Information' screen, all of the fields will be editable. The 'Default Contact' checkbox is checked upon navigating to the page. Each time you add a new chemical report, the associated default technical contact is displayed (to help avoid entering the same information multiple times). Note that checking the default box will not replace entered technical contact information previously entered for other chemical reports in your CDR Form U.

- **Copy CDX Registration:** Click the 'Copy CDX Registration' button to copy your CDX registration information into the technical contact information fields.
- **Technical Contact Name (1.C.1):** Enter the name of the person whom EPA may contact about information submitted for a chemical substance.
- **Company Name (1.C.2):** Enter the name of the company for whom the technical contact works.
- Technical Contact Telephone Number and Email Address (1.C.3 and 1.C.4): Enter the technical contact's telephone number, including the area code, and the technical contact's email address. Do not enter any dashes or parentheses when entering the telephone number.
- **Technical Contact Mailing Address (1.C.5 through 1.C.10):** Enter the technical contact's full mailing address. Post office box numbers should be accompanied by a street address. If a post office box is used as a mailing address, enter the street address in field 1.C.5 and enter the post office box number in field 1.C.6.
- **Default Contact:** The 'Default Contact' checkbox is automatically checked to indicate that the first individual is the default technical contact for all chemical substances.



Exhibit 3 -18 shows a screen capture of the 'Section 1.C - Technical Contact Information' screen:

Exhibit 3-18: Section 1.C - Technical Contact Information Screen (Edit Mode)



Edit an existing technical contact: You can edit an existing technical contact by clicking the technical contact's name link under the 'Company and Site Identification Information' folder in the navigation tree. The technical contact information previously created will display in the 'Section 1.C – Technical Contact Information' screen and the fields will be editable. Make applicable changes and click the 'Save' icon (INCLUDEPICTURE

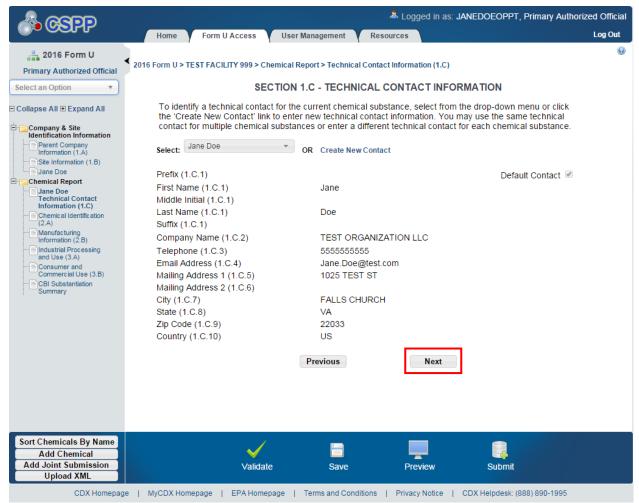
"http://devngn.epacdxnode.net/cdx-oppt-iur/images/save_32.png" * MERGEFORMATINET =
) to save your changes.

Creating multiple technical contacts: You can add a new technical contact (after you have created at least one technical contact). Click the 'Technical Contact Information (1.C)' link from the navigation tree. You will see the technical contact information that you entered previously. Click the 'Create New Contact' link to clear the form to add a new technical contact.



Exhibit 3-19 shows a screen capture of the 'Technical Contact Information' screen after it is populated:

Exhibit 3-19: Technical Contact Information Screen (Populated)



Navigation: Click the 'Next' button to navigate to the 'Section 2.A - Chemical Identification' screen. You can also click the 'Chemical Identification (2.A)' link under the 'Chemical Report' folder or under the 'Joint Submission' folder on the navigation tree.

3.4.10 Chemical Report Folder

You can add one or more 'Chemical Report' folders (one for each reportable chemical substance per site) by clicking the 'Add Chemical' button from the bottom left of the action bar. When you click the 'Add Chemical' button, a new 'Chemical Report' folder is created in the navigation tree. The 'Chemical Report' folder displays the following links:

• **Technical Contact Information (1.C):** Click this link to navigate to the 'Section 1.C – Technical Contact Information' screen. For additional details about the 'Section 1.C – Technical Contact Information' screen, please refer to **Section 3.4.9**.

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- **Chemical Identification (2.A):** Click this link to navigate to the 'Section 2.A Chemical Identification' screen. For additional details about the 'Section 2.A Chemical Identification' screen, please refer to **Section 3.4.11**.
- Manufacturing Information (2.B): Click this link to navigate to the 'Section 2.B Manufacturing Information' screen. For additional details about the 'Section 2.B Manufacturing Information' screen, please refer to Section 3.4.14.
- **Industrial Processing and Use (3.A):** Click this link to navigate to the 'Section 3.A Industrial Processing and Use' screen. For additional details about the 'Section 3.A Industrial Processing and Use' screen, please refer to **Section 3.4.15**.
- **Consumer and Commercial Use (3.B):** Click this link to navigate to the 'Section 3.B Consumer and Commercial Use' screen. For additional details about the 'Section 3.B Consumer and Commercial Use' screen, please refer to **Section 3.4.16**.
- **CBI Substantiation Summary:** Click this link to navigate to the 'CBI Substantiation Summary' screen. For additional details about the 'CBI Substantiation Summary' screen, please refer to **Section 3.4.17**.

3.4.11 Chemical Identification (Section 2.A)

You can access the 'Section 2.A - Chemical Identification' screen either by clicking the 'Next' button on the 'Section 1.C - Technical Contact Information' screen or by clicking the 'Chemical Identification (2.A)' link from the navigation tree.

Search for a Chemical Substance in the Substance Registry Services (SRS) Search: You can search for a chemical substance by using the search mechanism in EPA's SRS Search. Click the 'Search' button on the 'Section 2.A - Chemical Identification' screen to navigate to the 'Substance Registry Services Search' screen.



Exhibit 3 -20 shows a screen capture of the 'Section 2.A - Chemical Identification' screen:

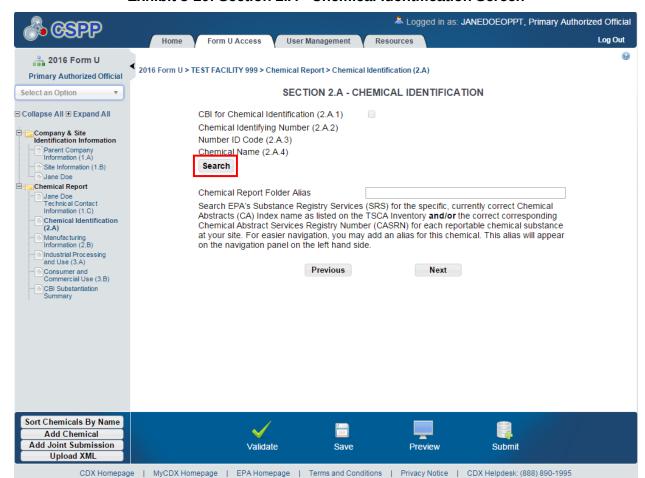


Exhibit 3-20: Section 2.A - Chemical Identification Screen

On the SRS Search screen, you can search for the desired chemical substance by various search fields. To search SRS, enter one of the following search fields and click the 'Search' button:

For chemical substances listed on the *non-confidential* portion of the TSCA Inventory, Search by Chemical Abstracts Service Registry Number (CASRN), Chemical Abstracts (CA) Index Name, or a Synonym: Enter data in the 'CASRN' field and/or the 'CA Index Name or Other Synonym' field and click the 'Search' button. Search results will display in a table format at the bottom of the screen. If no information is retrieved back from SRS, the bottom of the screen will display a 'No Results Found' message. If you enter data into both of the fields and click the 'Search' button, the system will perform an 'and' search. Search results are retrieved that match both of the search criteria fields and will display in a table format at the bottom of the screen.

• **CASRN:** You may enter an exact CASRN or another identifying number. Search results will display CASRNs or other numbers that exactly match the numbers that you entered.

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• **CA Index Name or Other Synonym:** You may enter a full or partial CA index name, biological name, EPA registry name, or other synonym. Search results will display CA index names or other synonyms that contain, begin with, or exactly match the name that you entered. Use the drop-down menu to specify the search criteria.

For chemical substances listed on the *confidential* **portion of the TSCA Inventory, search by Accession Number and/or Generic Name:** Enter data in the 'Accession Number' field and/or the 'Generic Name' field and click the 'Search' button. Search results will display in a table format at the bottom of the screen. If no information is retrieved back from SRS, the bottom of the screen will display a 'No Results Found' message.

- **TSCA Accession Number:** You may enter a full or partial Accession number. Search results will display Accession numbers that contain, begin with, or exactly match the numbers that you entered. Use the drop-down menu to specify the search criteria.
- **Generic Name:** You may enter a full or partial generic name. Search results will display Generic Names that contain, begin with, or exactly match the name that you entered. Use the drop-down menu to specify the search criteria.

When searching by generic name, please be aware that the same Generic Name may have been used for different chemical substances. Only the Accession Number is unique. You should take care to ensure that you are selecting the correct chemical substance.



Exhibit 3 -21 shows a screen capture of the 'Substance Registry Services Search' screen:

Exhibit 3-21: Substance Registry Services Search Screen

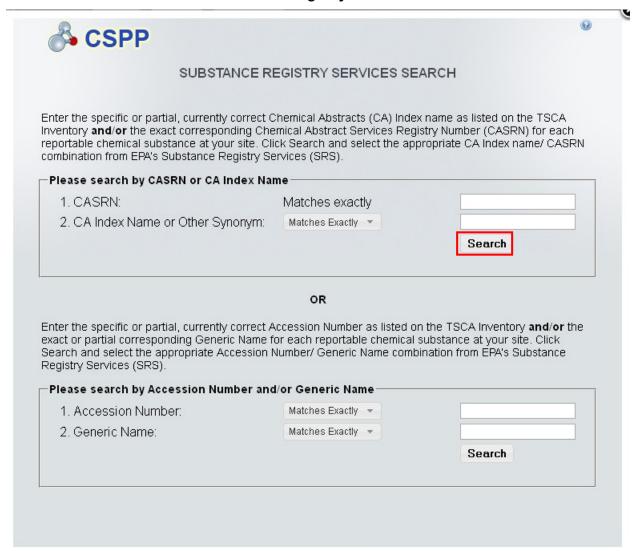
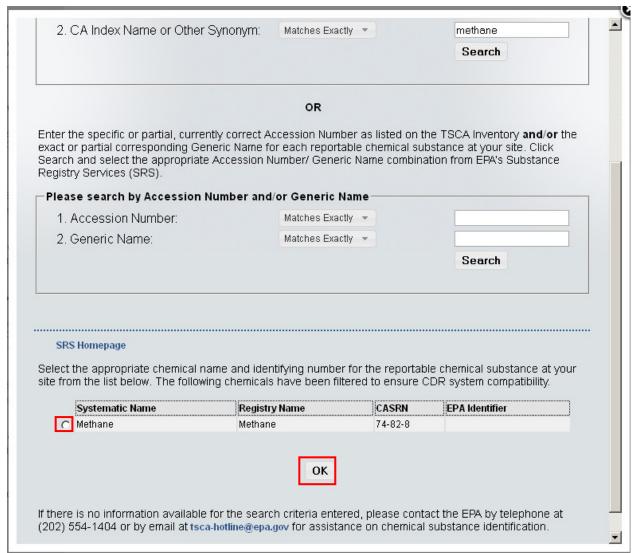




Exhibit 3 -22 shows a screen capture of the 'Substance Registry Services Search' screen with search results:

Exhibit 3-22: Substance Registry Services Search Screen (Search Results)



Navigation: Select the chemical substance from the 'Substance Registry Services Search' window by selecting the radio button (located to the left of the chemical name) and clicking the 'OK' button. You will be taken to the 'Section 2.A – Chemical Identification' screen and the information in blocks 2.A.2 - 2.A.4 will be populated. Depending on the threshold or exemption that the selected chemical is subject to, a message displays on the 'Section 2.A – Chemical Identification' screen, and the following information will be populated:

• **CBI for Chemical Identification (2.A.1):** You may claim as confidential the identity of a chemical substance that is already listed as confidential on the TSCA Inventory. Such chemical substances will be listed by a TSCA Accession number in SRS. Claims for confidential treatment of the identity of a chemical substance that is listed on the public section of the TSCA Inventory are not valid and will not be allowed.



To assert a claim of confidentiality for the Accession number corresponding to the confidential chemical substance intended to be reported, check the 'CBI for Chemical Identification (2.A.1)' checkbox and submit detailed written answers to the questions to substantiate your CBI claims. You may also upload an optional document. See **Section 3.4.17** for more information on substantiating CBI claims.

- **Chemical Identifying Number (2.A.2):** Displays the specific CASRN or Accession number for each reportable chemical substance.
- **Number ID Code (2.A.3):** Displays the code specifying the type of identifying number entered in the SRS Search screen. Either "Accession Number" or "CASRN" will be displayed.
- **Chemical Name (2.A.4):** Displays the specific chemical name that is returned from the SRS search screen.

Chemical Report Folder Alias: To help distinguish between the different chemical substances added to the CDR Form U, the CASRN or Accession Number, as appropriate, is used as the default display name for the "Chemical Report" folder in the navigation tree. If desired, you can enter an alias or alternative name. If you do not enter an alias, the default CASRN or Accession Number will continue to be used.

Exhibit 3 -23 shows a screen capture of the 'Section 2.A - Chemical Identification' screen after it is populated:

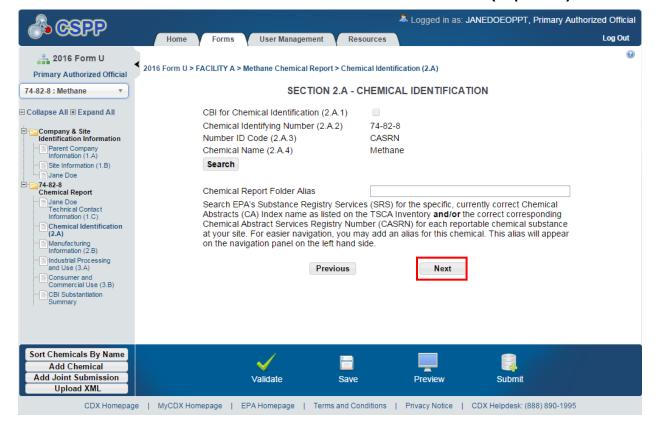


Exhibit 3-23: Section 2.A - Chemical Identification Screen (Populated)



Navigation: Click the 'Next' button to navigate to the 'Section 2.B – Manufacturing Information' screen. You can also click the 'Manufacturing Information (2.B)' link under the 'Chemical Report' folder or under the 'Joint Submission' folder within the navigation tree.

3.4.12 Add Joint Submission

A joint submission is a collaborative process that allows the completion of a chemical report in a CDR Form U by two different companies. Joint submissions are allowed only in those instances where a supplier will not disclose to the manufacturer (including importer) the specific chemical name of the imported chemical substance or of a reactant used to manufacture a chemical substance because the specific chemical name is claimed confidential. The manufacturer (including importer) is responsible for ensuring that the CDR information is submitted to EPA; therefore, he/she must ask the supplier of the confidential chemical substance to directly provide EPA with the correct chemical identity in Part IV of CDR Form U.

In a joint submission, the manufacturer (including importer) provides the manufacturing and processing and use data and the Secondary Submitter (supplier) provides the chemical identity information for trade products being reported on the form.

If you know the percent composition of each component chemical substance of a trade name product or mixture, you should not file jointly with a supplier. Additionally, in the event that you know the chemical identity of the chemical substance you are reporting, you must provide that information irrespective of a supplier's confidentiality claims.

You can add one or more joint submission folders (one for each trade product) by clicking the 'Add Joint Submission' button from the bottom action bar. A new 'Joint Submission Report' folder will be created in the left navigation tree and will have the following links:

- **Technical Contact Information (1.C):** Click this link to navigate to the 'Section 1.C Technical Contact Information' screen. For additional details about the 'Section 1.C Technical Contact Information' screen, please refer to **Section 3.4.9**.
- **Chemical Identification (2.A):** Click this link to navigate to the 'Section 2.A Chemical Identification' screen for joint submitters. For additional details about the 'Section 2.A Chemical Identification' screen for joint submitters, please refer to **Section 3.4.13**.
- Manufacturing Information (2.B): Click this link to navigate to the 'Section 2.B Manufacturing Information' screen. For additional details about the 'Section 2.B Manufacturing Information' screen, please refer to Section 3.4.14.
- **Industrial Processing and Use (3.A):** Click this link to navigate to the 'Section 3.A Industrial Processing and Use' screen. For additional details about the 'Section 3.A Industrial Processing and Use' screen, please refer to **Section 3.4.15**.
- **Consumer and Commercial Use (3.B):** Click this link to navigate to the 'Section 3.B Consumer and Commercial Use' screen. For additional details about the 'Section 3.B Consumer and Commercial Use' screen, please refer to **Section 3.4.16**.
- **CBI Substantiation Summary:** Click this link to navigate to the 'CBI Substantiation Summary' screen. For additional details about the 'CBI Substantiation Summary' screen, please refer to **Section 3.4.17**.



3.4.13 Section 2.A - Chemical Identification for Joint Submission

If you are entering data within the 'Joint Submission Report' folder, you can access the 'Section 2.A – Chemical Identification' screen for joint submitters by clicking the 'Next' button on the 'Section 1.C - Technical Contact Information' screen or by clicking the 'Chemical Identification (2.A)' link in the navigation tree.

Enter the following information for the secondary submitter who will be filling out Part IV of CDR Form U:

- **Trade Product Name or Another Designation (2.A.5):** Enter the trade product name of the chemical substance. By default, the name provided in field 2.A.5 will appear in the navigation tree.
- **Other Information (2.A.6):** You can enter additional information pertaining to the identity of the chemical substance (optional).
- **Secondary Company Name (2.A.7):** Enter the company name of the secondary submitter who will be filling out Part IV of the form.
- Secondary Company Address (2.A.8 through 2.A.12): Enter the street address of the secondary company along with the city/town, state/province, zip code, and country information.
- **Joint Submission Report Folder Alias**: Optionally, if you add an alias here, the alias will become the name of the report folder in the navigation tree.

Unique Identifier for Joint Submission: Follow the instructions in the box labeled 'Unique Identifier for Joint Submission' to communicate with the Secondary Submitter via email. The tool will generate an email with a unique ID and language that you can use to notify your Secondary Submitter of the partial CDR submission containing information for the trade name product. This will allow the Secondary Submitter to complete his/her portion of the form.



Exhibit 3 -24 shows the screen capture of the 'Section 2.A - Chemical Identification' screen (Scroll 1) for a joint submission:

Exhibit 3-24: Section 2.A - Chemical Identification Screen - Joint (Scroll 1)

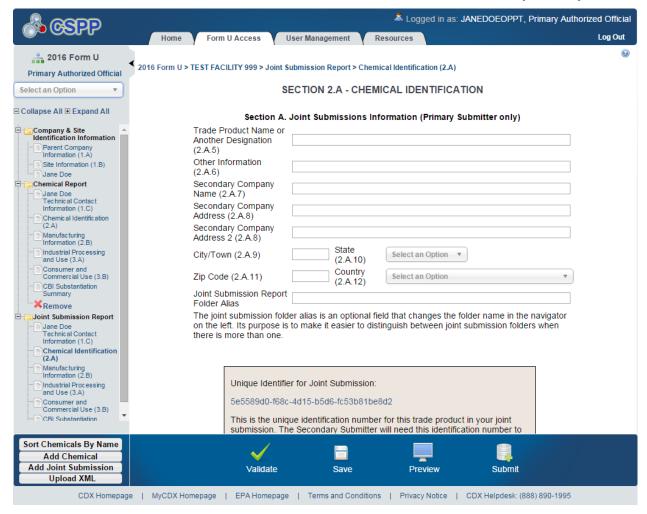
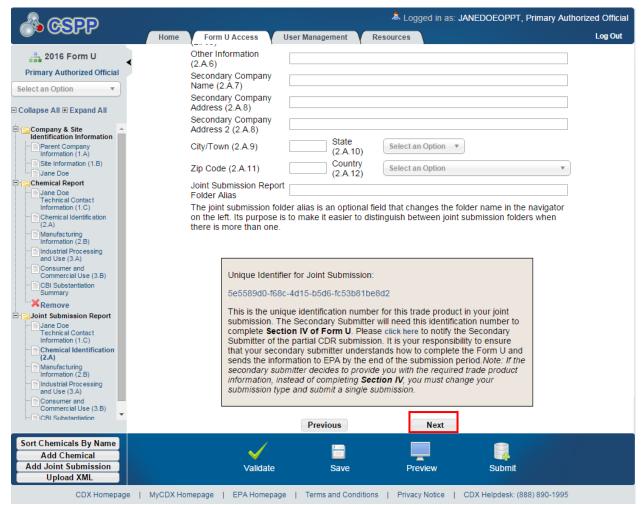




Exhibit 3 -25 shows the screen capture of the 'Section 2.A - Chemical Identification' screen (Scroll 2) for a joint submission:

Exhibit 3-25: Section 2.A - Chemical Identification Screen – Joint (Scroll 2)



Navigation: Click the 'click here' link within the instructional text to email the Secondary Submitter. The fields on the 'Section 2.A – Chemical Identification' screen must be populated first before the Secondary Submitter can be notified of a joint submission.

On the email screen, most of the information is auto-populated along with the message to be provided to the Secondary Submitter. The following information will be displayed on the 'Email' screen:

- **From:** Defaults to your email address from CDX registration.
- **CC:** Displays the technical contact's email address.
- **To:** Enter the email address of the Secondary Submitter or any other person whom you want to send the unique identification information. The value entered must have an '@' sign to be a valid email address (e.g., joesmith@company.com). You can send the email to one or more email addresses by separating each email address by either a comma or a semicolon.
- **Subject:** The subject text is defaulted to '[Reporting Year] Chemical Data Reporting.'

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- **Message:** Displays the 'Unique ID' and language that you can use to notify your Secondary Submitter of the partial CDR submission containing information for the trade name product.
- **Additional Information:** Enter additional information that you want to email to the Secondary Submitter (optional).

Exhibit 3 -26 shows the screen capture of the 'Email' screen (Scroll 1) for a joint submission: **Exhibit 3-26**: **Email Screen (Scroll 1)**

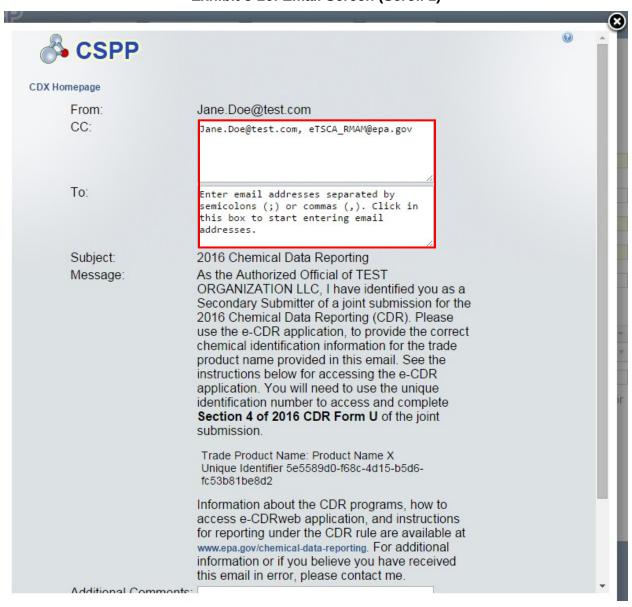
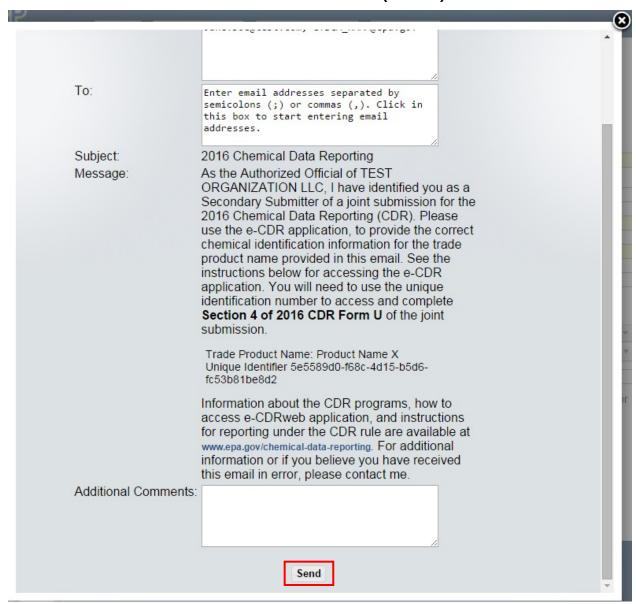




Exhibit 3 -27 shows the screen capture of the 'Email' screen (Scroll 2) for a joint submission:

Exhibit 3-27: Email Screen (Scroll 2)



After entering all information on the 'Email' screen, click the 'Send' button to send the email to the appropriate recipients and navigate back to the 'Section 2.A – Chemical Identification' screen.

Navigation: Click the 'Next' button to navigate to the 'Section 2.B - Manufacturing Information' screen. You can also click the 'Manufacturing Information (2.B)' link either under the 'Chemical Report' folder or under the 'Joint Submission' folder within the navigation tree.

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3.4.14 Section 2.B - Manufacturing Information

You can access the 'Section 2.B – Manufacturing Information' screen by clicking the 'Next' button from the 'Section 2.A - Chemical Identification' screen or by clicking the 'Manufacturing Information (2.B)' link from within the navigation tree.

This section describes the manufacturing data elements that should be reported for your reportable chemical substance(s) for the current calendar year. Report the information to the extent that such information is known or reasonably ascertainable by you. If any information is not known or reasonably ascertainable (NKRA) by you (including your company), enter or select 'NKRA' in the box corresponding to that data element. You may also check the CBI checkbox next to each data element to claim data as confidential. See the Instructions for Reporting on the CDR website for how to determine if your data qualifies for a CBI claim. However, keep in mind that you cannot claim an 'NKRA' designation as confidential. Enter the following fields of data on the 'Section 2.B - Manufacturing Information' screen:

- **CBI for Company Identification (2.B.1):** Check the CBI checkbox to assert a confidentiality claim for the link between the chemical substance and the company information reported in 'Section 1.A Primary Company Information.'
- **CBI for Site Identification (2.B.2):** Check the CBI checkbox and complete the substantiation questions to assert a confidentiality claim for the link between the chemical substance and the site identity reported in 'Section 1.B Site Identification.' If you check the CBI checkbox, you will be taken to the 'CBI Substantiation' screen where you must answer each question pertaining to the CBI claim. See **Section 3.4.17** for more information on substantiating CBI claims.
- **CBI for Technical Contact Information (2.B.3):** Check the CBI checkbox to assert a confidentiality claim for the link between the chemical substance and the technical contact information reported in 'Section 1.C Technical Contact Information.'
- Report Calendar Year 2015 Production Volume:
 - **Activity (Manufacture and/or Import) (Block 2.B.4):** If you both domestically manufacture and import the same chemical substance, enter a value into the 'Domestically Manufactured' and/or 'Imported' fields to enable the 'Manufacture' and/or 'Import' checkbox.
 - **Domestically Manufactured Production Volume (Block 2.B.5):** Enter the volume of the chemical domestically manufactured at your site during calendar year 2015 (for the 2016 reporting year), or for calendar year 2011 (for the 2012 reporting year) in pounds. Report the quantity to at least two significant figures. Production volumes should be reported in numeric format, without commas (e.g., 6352000). For example, '2 million' or '2 E6' are not acceptable, and production volumes with decimals or abbreviations such as M (e.g., 12,000,000 = 12M) or K (e.g., 50,000 = 50K) are not acceptable.
 - **Imported Production Volume (Block 2.B.6):** Enter the volume of chemical imported by your site in calendar year 2015, in pounds. Report the quantity to at least two significant figures. Use the same numeric format as described for Block 2.B.5, Domestically Manufactured Production Volume.
 - **Imported Chemical Physically at Site (2.B.7):** Use the drop-down menu to indicate whether an imported chemical was never physically at the reporting site. This field will be



- editable and mandatory when the imported checkbox (2.B.4) is selected in the activity field and when data is entered in the 'Imported' (2.B.6) field.
- Volume Used on Site (2.B.8): Enter the total volume of the chemical substance used at the reporting site, in pounds. The volume used on-site should not exceed the sum of the domestically manufactured and imported volumes minus the volume exported (i.e., (Block 2.B.5 + Block 2.B.6) Block 2.B.9). Report the quantity to at least two significant figures. Use the same numeric format as described for Block 2.B.5, Domestically Manufactured Production Volume.
- Volume Exported (2.B.9): Enter the volume directly exported and not domestically processed or used, in pounds. The volume exported should not exceed the sum of the domestically manufactured and imported volumes minus the volume used on site (e.g., (Block 2.B.5 + Block 2.B.6 Block 2.B.8). Report the quantity to at least two significant figures. Use the same numeric format as described for Block 2.B.5, Domestically Manufactured Production Volume.
- **Number of Workers (2.B.10):** Select from the drop-down menu the code corresponding to the appropriate range for the number of workers reasonably likely to be exposed to a reportable chemical substance during manufacture. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\AppData\\Local\\AppData\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\Settings\\\Documents and Settings\\Sdose\\Local Settings\\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\Documents and Settings\\Documents and Settings\\Documents and Settings\\Documents and Settings\\Documents and Settings\\Sdose\\Desktop\\mockups\\elluR\\images\\help.png" * MERGEFORMAT ③) for a detailed explanation of the different code options.
- Max Concentration (2.B.11): Select from the drop-down menu the code corresponding to the appropriate maximum concentration range of the chemical substance. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\AppData\\Local\\ AppData\\Documents and Settings\\sdose\\Local Settings\\Documents and Settings\\sdose\\Local Settings\\Temporary Internet Files\\ Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\Documents and Settings\\Sdose\\Desktop\\mockups\\ellur\\ images\\help.png" * MERGEFORMAT (a)) for a detailed explanation of the different code options.
- Is Chemical Substance Being Recycled, Remanufactured, Reprocessed, Reused, or Reworked? (2.B.12): Select from the drop-down menu the appropriate value indicating if the chemical substance is being recycled, remanufactured, reprocessed, reused, or reworked. By selecting 'Yes,' you indicate that the manufactured chemical substance, which otherwise would be disposed of as a waste, is being removed from the waste stream and is being used or reused for a commercial purpose.
- **Report Physical Form for 2015 Production Volume:** Report all physical forms of the chemical substance at the time it is reacted, or as it leaves your site, and the percentage of production volume. For each chemical substance at each site, you must report as many physical forms as applicable by selecting the appropriate blocks which represent the following six physical forms:

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- Dry Powder
- Pellets or Large Crystals
- Water- or Solvent-Wet Solid
- Other Solid
- Gas or Vapor
- Liquid
- Not Known or Reasonably Ascertainable (NKRA)

You are required to select at least one (1) physical form. If the chemical substance is sent offsite in more than one physical form, report all the physical forms in which it is sent off-site. Select 'NKRA' if the physical form of the chemical substance is not known or reasonably ascertainable by you.

Report the percentage of the total production volume of the chemical substance for each physical form reacted onsite or sent off-site rounded off to the closest 10 percent. These percentages may total more or less than 100% due to rounding. If the total is more than 100%, then a warning message will be displayed; however, that does not prevent you from proceeding with completing the form. If you see the warning message, please ensure that you have reported the physical forms associated with your full production volume. The sum of your entered '% Production Volume' associated with each physical form reported in this section should correspond to all of your production.

• **Report Past Production Volume:** Enter the total volume of the chemical manufactured at your site (include domestically manufactured and imported volumes) during each of the calendar years 2014, 2013, and 2012, in pounds.

Exhibit 3 -28 shows the screen capture of the 'Section 2.B - Manufacturing Information' screen (Scroll 1):



Exhibit 3-28: Section 2.B - Manufacturing Information Screen (Scroll 1)

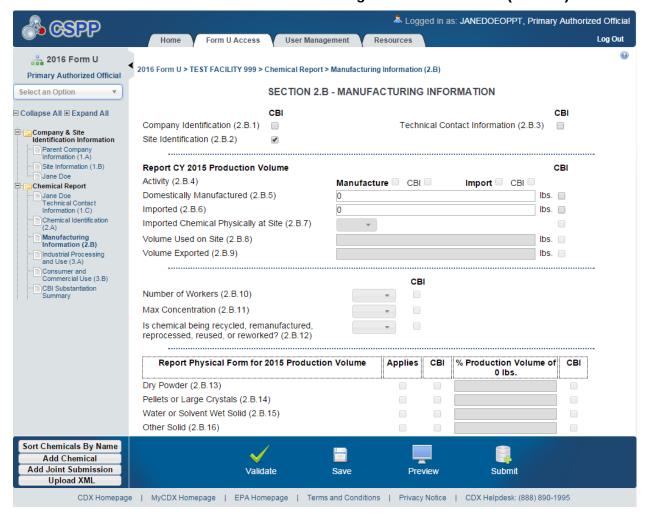


Exhibit 3 -29 shows the screen capture of the 'Section 2.B - Manufacturing Information' screen (Scroll 2):



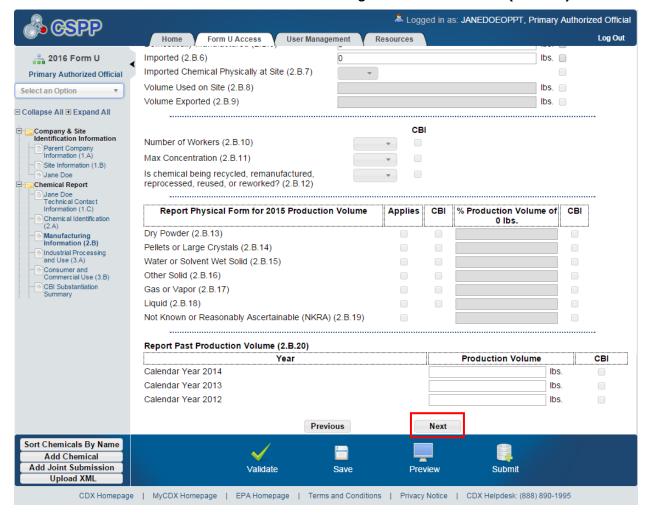


Exhibit 3-29: Section 2.B - Manufacturing Information Screen (Scroll 2)

Navigation: Click the 'Next' button to navigate to the 'Section 3.A - Industrial Processing and Use' screen. You can also click the 'Industrial Processing and Use (3.A)' link on the navigation tree.

3.4.15 Section 3.A - Industrial Processing and Use

You can access the 'Section 3.A – Industrial Processing and Use' screen by clicking the 'Next' button from the 'Section 2.B – Manufacturing Information' screen or by clicking the 'Industrial Processing and Use (3.A)' link from within the navigation tree.

This section describes the industrial processing and use information that should be reported for your reportable chemical substance(s) for calendar year 2015 (for the 2016 reporting year) and 2011 (for the 2012 reporting year). Report the information to the extent that such information is known, or reasonable ascertainable, by you. If any information is not known or reasonably ascertainable by you (including your company), enter or select 'NKRA' in the box corresponding to that data element. You may also check the CBI checkbox next to each data element to claim the data confidential. However, keep in mind that you **cannot** claim an 'NKRA' designation as confidential. Checking a CBI checkbox associated with a specific processing and use data



element automatically triggers substantiation questions. See **Section 3.4.17** for more information on substantiating CBI claims.

Screen Validation: For each reportable chemical substance, report at least one (1) and up to ten (10) unique combinations of the 'Type of Process or Use,' 'Sector,' and 'Industrial Function Category.' For each of these unique combinations, you are also required to report the 'Percent Production Volume,' the 'Number of Sites,' and the 'Number of Workers.'

Actions:

- You can enter more than ten (10) rows of data by clicking the 'Add' icon (denoted by a plus sign). If you need to delete a certain row, click the 'Delete' icon (denoted by an 'X'). This will delete the row and all the data in the row. A warning message displays to confirm the deletion.
- If the chemical is not used in industrial processing or for industrial use, you may check the 'Not Applicable' checkbox at the top of the 'Section 3.A Industrial Processing and Use' screen. If you check the 'Not Applicable' checkbox, all fields on the screen will be disabled and you may move on to the next screen. If you have any data entered on the screen and you check the 'Not Applicable' checkbox, all the data will be deleted and all the fields on the screen will be disabled for editing. You cannot select 'Not Applicable' on both the 'Section 3.A Industrial Processing and Use' and the 'Section 3.B Consumer and Commercial Use' screens unless you are below the 25,000 pound or 2,500 pound production volume (including imports) threshold or are reporting on a partially exempt chemical.

Enter the following fields of data on the 'Section 3.A - Industrial and Processing Use' screen:

- Type of Process or Use: Select from the drop-down menu the appropriate 'Type of Process or Use Operation.' Click the 'Help' icon (INCLUDEPICTURE "C:\Users\\PSmith03\\ AppData\\Local\\AppData\\AppData\\Local\\Microsoft\\Documents and Settings\\sdose\\ Documents and Settings\\sdose\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\ sdose\\Documents and Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\ sdose\\Documents and Settings\\Documents and Settings\\ sdose\\Documents and Settings\\Documents and Sett
- Sector(s): Select from the drop-down menu the appropriate 'Industrial Sector (IS)' code for all sites that receive a reportable chemical substance. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\AppData\\Local\\AppData\\AppData\\Local\AppData\\Local\\AppData\\Local\\AppData\\Local\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppDat
- **Industrial Function Category:** Select from the drop-down menu the appropriate 'Industrial Function Category.' Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\ PSmith03\\AppData\\Local\\AppData\\Local\\Microsoft\\Documents and



Settings\\Sdose\\Documents and Settings\\Sdose\\Local Settings\\Documents and Settings\\Sdose\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\Documents and Settings\\Documents and Settings\\Documents and Settings\\Sdose\\Desktop\\mockups\\eIUR\\images\\help.png'' * MERGEFORMAT (3)) for a detailed explanation of the different code options.

- **Percent Production Volume:** Enter an estimate of the percentage of production volume that is attributable to each unique combination of 'Type of Process or Use Code,' 'Sector,' and 'Industrial Function Category' code. Click the 'Help' icon (INCLUDEPICTURE "C:\\ Users\\PSmith03\\AppData\\Local\\AppData\\Local\\Microsoft\\Documents and Settings\\sdose\\Local Settings\\Documents and Settings\\Sdose\\Local Settings\\Documents and Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\Documents and
- Number of Sites: Select from the drop-down menu the appropriate number range for the total number of industrial sites, including those not under your control, that process or use each reported chemical substance. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\ PSmith03\\AppData\\Local\\AppData\\AppData\\Local\\Microsoft\\Documents and Settings\\sdose\\Local Settings\\Documents and Settings\\Local Settings\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\D
- Number of Workers: Select from the drop-down menu the total number of workers that are reasonably likely to be exposed to the chemical substance at sites that process or use the chemical substance. Include workers at sites that are not under your control, as well as sites that you control. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\ AppData\\Local\\AppData\\AppData\\Local\\Microsoft\\Documents and Settings\\sdose\\Local Settings\\Sdose\\Local Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\ sdose\\Documents and Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\ sdose\\Documents and Settings\\Documents and Settings\\ sdose\\Documents and Settings\\Documents and Setti

Exhibit 3 -30 shows a screen capture of the 'Section 3.A - Industrial Processing and Use' screen:



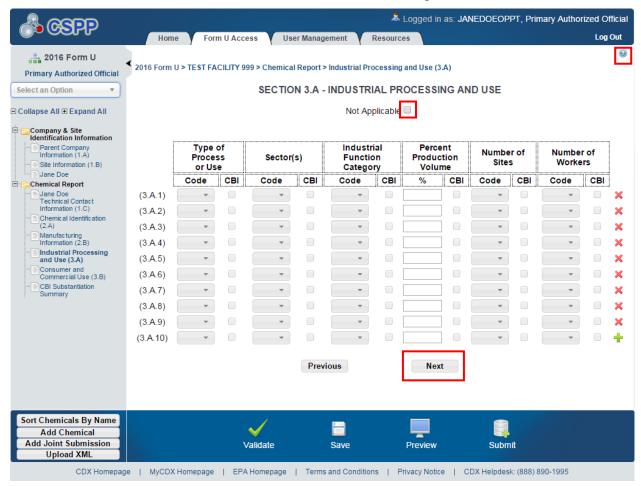


Exhibit 3-30: Section 3.A - Industrial Processing and Use Screen

Navigation: Click the 'Next' button to navigate to the 'Section 3.B - Consumer and Commercial Use' screen. You can also click the 'Consumer and Commercial Use (3.B)' link within the navigation tree.

3.4.16 Section 3.B - Consumer and Commercial Use

Access the 'Section 3.B – Consumer and Commercial Use' screen by clicking the 'Next' button from the 'Section 3.A – Industrial Processing and Use' screen or by clicking the 'Consumer and Commercial Use (3.B)' link within the navigation tree.

This section describes the consumer and commercial use information that should be reported for your reportable chemical substance(s) for calendar year 2015 (for the 2016 reporting year) or 2011 (for the 2012 reporting year). Report the information to the extent that such information is known, or reasonable ascertainable, by you. If any information is not known or reasonably ascertainable by you (including your company), enter or select 'NKRA' in the box corresponding to that data element. You may also check the CBI checkbox next to each data element to claim the data confidential. However, keep in mind that you **cannot** claim an 'NKRA' designation as confidential. Checking a CBI checkbox associated with a specific consumer and commercial use

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data element automatically triggers substantiation questions. See **Section 3.4.17** for more information on substantiating CBI claims.

Screen Validation: For each reportable chemical substance, report at least one (1) and up to ten (10) unique product categories that correspond to the actual use of the chemical substance. For each product category reported, indicate whether the use is a consumer and/or commercial use, whether the chemical substance is used in products intended for children, the percentage of production volume, the maximum concentration, and the number of commercial workers reasonably likely to be exposed.

Actions:

- You can enter more than ten (10) rows of data by clicking the add '+' icon. If you need to delete a certain row, click the delete 'X' icon. This will delete the row and all the data in the row. A warning message will be displayed asking you to confirm the deletion.
- If the chemical is not for consumer or commercial use, you may check the 'Not Applicable' checkbox at the top of the 'Section 3.B Consumer and Commercial Use' screen. If you check the 'Not Applicable' checkbox, all the fields on the screen will be disabled. If you have any data entered on the screen and you click the 'Not Applicable' checkbox, all the data will be deleted and all the fields on the screen will be disabled for editing. You cannot select 'Not Applicable' on both the 'Section 3.A Industrial Processing and Use' and the 'Section 3.B Consumer and Commercial Use' screens unless you are below the 25,000 pound or 2,500 pound production volume (including imports) threshold or are reporting on a partially exempt chemical.

Enter the following fields of data on the 'Consumer and Commercial Use' screen:

- **Product Category:** Select from the drop-down menu the product category that corresponds to the use of the chemical substance. Click the 'Help' icon (INCLUDEPICTURE "C:\\ Users\\PSmith03\\AppData\\Local\\AppData\\AppData\\Local\\Microsoft\\Documents and Settings\\sdose\\Local Settings\\Documents and Settings\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\ Temporary Internet Files\\Local Settings\\ Documents and Settings\\Temporary Internet Files\\Local Settings\\ Documents and Settings\\Documents and Settings\\Documents
- Consumer or Commercial or both: Select from the drop-down menu the appropriate value to indicate whether the product has a consumer use, commercial use, or both. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\AppData\\Local\\AppData\\Local\\AppData\\Local\\Microsoft\\Documents and Settings\\sdose\\Documents and Settings\\sdose\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\Local Settings\\\Documents and Settings\\Documents and Settings\\Sdose\\Desktop\\\ mockups\\eIUR\\images\\help.png" * MERGEFORMAT ③) for a detailed explanation of the different code options.
- **Used in Products Intended for Children?:** Select from the drop-down menu the appropriate value to indicate whether any amount of the chemical substance or mixture is used in a consumer product intended for use by children. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\AppData\\Local\\AppData\\AppData\\Local\\



Microsoft\Documents and Settings\\sdose\\Documents and Settings\\Local Settings\\Documents and Settings\\Sdose\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\Sdose\\Desktop\\mockups\\eIUR\\ images\\help.png" * MERGEFORMAT (a) for a detailed explanation of the different code options.

- Percent Production Volume: Enter an estimate of the percentage of the production volume that is attributable to each specific consumer and commercial end use carried out at sites under your control. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\ AppData\\Local\\AppData\\AppData\\Local\\Microsoft\\Documents and Settings\\sdose\\ Documents and Settings\\sdose\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\ sdose\\Documents and Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\ sdose\\Documents and Settings\\Documents and
- Maximum Concentration: Select from the drop-down menu the appropriate concentration range for each chemical substance used in a consumer or commercial product. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\AppData\\Local\\AppData\\AppData\\AppData\\Local\\Microsoft\\Documents and Settings\\sdose\\Documents and Settings\\sdose\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\Sdose\\Desktop\\\ mockups\\elluR\\images\\help.png" * MERGEFORMAT (**)) for a detailed explanation of the different code options.
- Number of Commercial Workers Reasonably Likely to be Exposed: Select from the drop-down menu the appropriate number range of commercial workers, including those at sites not under your control that are reasonably likely to be exposed while using the chemical substance, with respect to each commercial use. Click the 'Help' icon (INCLUDEPICTURE "C:\\Users\\PSmith03\\AppData\\Local\\AppData\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\AppData\\Local\\Settings\\Sdose\\Local Settings\\Documents and Settings\\Sdose\\Local Settings\\Temporary Internet Files\\Content.Outlook\\Local Settings\\Temporary Internet Files\\Local Settings\\Temporary Internet Files\\Local Settings\\Documents and Settings\\Docum

Exhibit 3 -31 shows a screen capture of the 'Section 3.B - Consumer and Commercial Use' screen:



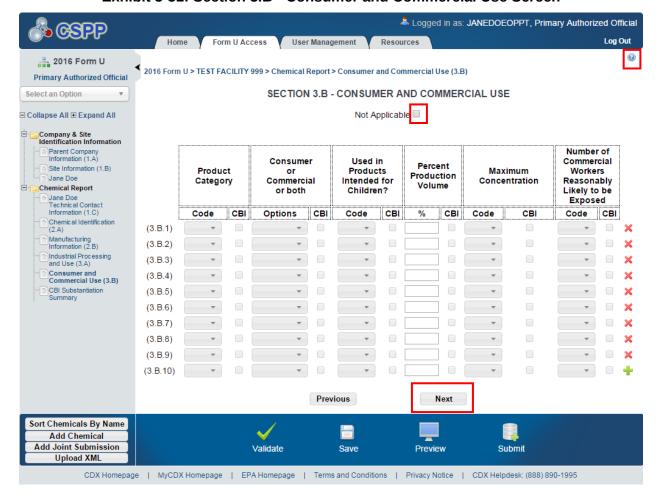


Exhibit 3-31: Section 3.B - Consumer and Commercial Use Screen

Navigation: Click the 'Next' button to navigate to the 'CBI Substantiation Summary' screen.

3.4.17 CBI Substantiation

The 'CBI Substantiation Summary' screen displays a summary of the substantiation questions that were answered during the process of populating the form

You are allowed to claim certain fields and information as CBI. When you click the fields that require upfront substantiation, the tool displays a 'CBI Substantiation Questions' window. To claim a field as CBI, you will be required to answer all the CBI substantiation questions displayed for that field.

You will be required to provide written answers to the substantiation questions. If you do not answer each of the questions, an error message displays when you click the 'Save' button. An optional file can also be uploaded.

- **Save:** Click the 'Save' button to save the answer(s) entered in response to the CBI substantiation questions.
- **Cancel:** Click the 'Cancel' button to navigate out of the window and remove the 'CBI' checkbox.



• **Delete:** Click the 'Delete' button to remove all CBI substantiations associated with a field.

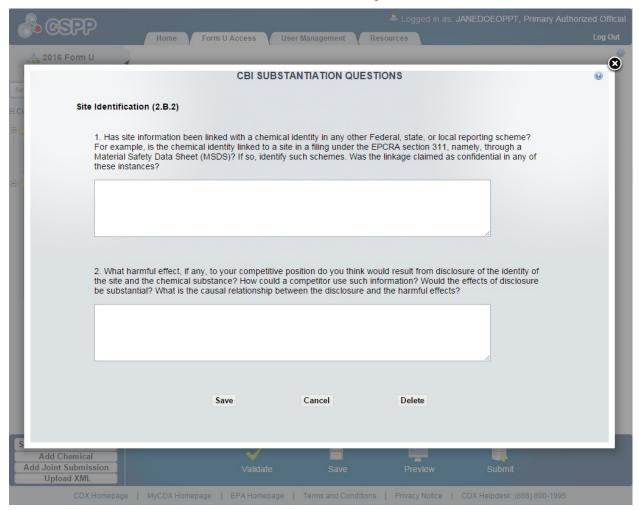
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Exhibit 3 -32 shows a screen capture of the 'CBI Substantiation Questions' window for claiming Site Identification as CBI on the 'Section 2.B – Manufacturing Information' page:

Exhibit 3-32: CBI Substantiation Questions Window



After answering all the CBI substantiation questions, you can click the 'Save' button to navigate back to the screen from which the 'CBI Substantiation Questions' window originates.



4 Validate

You can click the 'Validate' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/tick_32.png" * MERGEFORMATINET
) at any stage during the process of entering data to check for missing or invalid data. The 'CDR Form U Validation' pop-up window will display every time you click the 'Validate' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/tick_32.png" * MERGEFORMATINET
). This pop-up window will display a report of all the validation errors and warning messages.

Validation Errors: Errors are denoted by an error icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/exclamation.png" * MERGEFORMATINET ①) and can be fixed by clicking the error link. The links will display the screen section (e.g., Technical Contact Information (1.C)), the field section name (e.g., 1.C.1), and the associated error. After you click a link, the main screen will display the section where the error occurred so you can easily fix the issue. Once you have fixed the error, click the 'Validate' icon (INCLUDEPICTURE

"http://devngn.epacdxnode.net/cdx-oppt-iur/images/tick_32.png" * MERGEFORMATINET \(\sqrt{} \) again to refresh the 'CDR Form U Validation' pop-up window. If the information you fixed passes validation, the error will be removed from the 'CDR Form U Validation' pop-up window. You must correct all validation errors in order to submit the form to EPA via CDX. Once all validation errors have been resolved, if the 'Validate' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/tick_32.png" * MERGEFORMATINET \(\sqrt{} \) is clicked, the 'CDR Form U Validation' screen will indicate that there are no validation errors.

Warning Messages: Warnings are denoted by a warning icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/warning_16.png" *
MERGEFORMATINET (a) and can be addressed by clicking the warning link. The links will display the screen section, field section name, and the associated warning. After you click a link, the main screen will display the section where the warning occurred so that you can verify the data's validity. Once you have corrected or verified the data, click the 'Validate' icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/tick_32.png" *
MERGEFORMATINET (a) again to refresh the 'CDR Form U Validation' pop-up window. If the information you corrected or verified passes validation, the warning will be removed from the 'CDR Form U Validation' pop-up window. Once all validation warnings have been resolved, if the 'Validate' icon (INCLUDEPICTURE

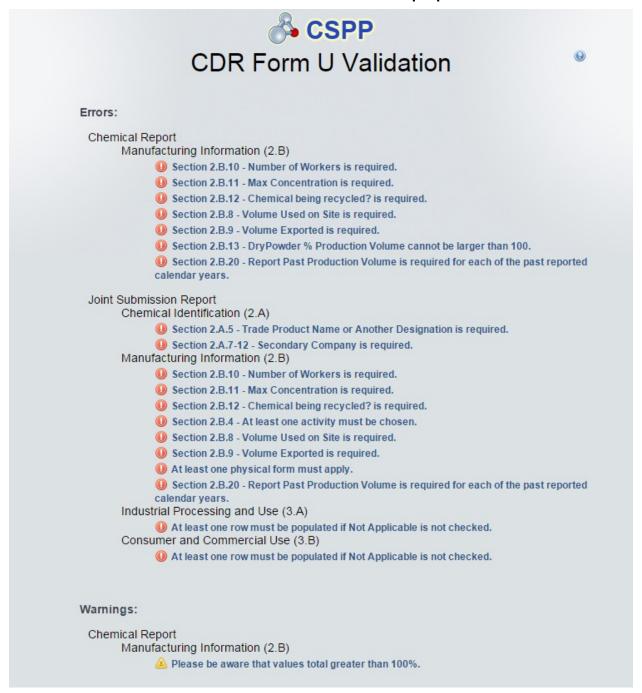
"http://devngn.epacdxnode.net/cdx-oppt-iur/images/tick_32.png" * MERGEFORMATINET \(\sqrt{1} \) is clicked, the 'CDR Form U Validation' pop-up window will indicate that there are no validation warnings. Although you should verify that the data indicated in the warning is valid, the tool will still allow you to pass validation and submit a form to EPA with active warning messages.

Close the 'CDR Form U Validation' pop-up window by clicking the 'X' button at the top right of the window.



Exhibit 4-33 shows a screen capture of the 'CDR Form U Validation' pop-up window:

Exhibit 4-33: CDR Form U Validation Pop-Up Window





5 Submit to EPA via CDX

As the Primary AO, you have the ability to sign and submit a CDR Form U to EPA. Primary Supports cannot sign and submit a CDR Form U. The "save" functionality will allow you to return to the same form at any point in the future. As you navigate and enter data into a CDR Form U, click the 'Save' button to avoid losing your entered data if you are using the navigation tree to maneuver within a form. You can also print the form at any point; however, the 'Not For Submission' watermark will be placed on the document if the form has not yet been submitted.

5.1 Submit Electronically – CROMERR Certification

Click the 'Submit' icon () located in the bottom action bar of the CDR Form U to access the 'Submission Process' Cross-Media Electronic Reporting Regulation Security System (CROMERR) screen.

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

Upon clicking the 'Submit' icon (), you will receive a prompt indicating 'This will begin the Form U submission process. Do you wish to proceed?'

Exhibit 5 -34 shows a screen capture of the submission prompt:

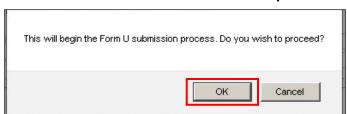


Exhibit 5-34: Submission Prompt

Click the 'OK' button to continue the submission and proceed to the validation process.



Exhibit 5 -35 shows a screen capture of the 'Submission Process: Validation' screen:

Exhibit 5-35: Submission Process: Validation Screen



SUBMISSION PROCESS: VALIDATION



Running validation on your Form U data



(Please disable any pop-up blockers within your internet browser settings to allow for the validation pop-up to be displayed if validation errors are present.)



Once validation has been successfully completed, you have the option to preview the watermarked draft version of the CDR Form U, which will be displayed as a PDF.



Exhibit 5 -36 shows a screen capture of the 'Submission Process: PDF Generation' screen:

Exhibit 5-36: Submission Process: PDF Generation Screen



Navigation: Click the 'View PDF' button to view the CDR Form U. A watermarked draft PDF version of the form may display in a separate window. Once you are satisfied with the contents of the form, click the 'Continue' button to proceed with the submission process.

On the 'Cross-Media Electronic Reporting Regulation (CROMERR) Certification' screen, you will be asked to certify your submission. By clicking on the 'I Certify' button on the CROMERR screen, you are authenticating all the information entered on the CDR Form U and agreeing to take full responsibility for the submission of the data. If you are not yet ready to authenticate the information, click the 'Cancel' button.

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Exhibit 5 -37 shows a screen capture of the 'Cross-Media Electronic Reporting Regulation (CROMERR) Certification' screen:

Exhibit 5-37: Cross Media Electronic Reporting Regulation (CROMERR) Certification Screen



Navigation: Click the 'I Certify' button to navigate to the 'CROMERR LOGIN' screen.

5.2 Cross-Media Electronic Reporting Regulation (CROMERR) Login

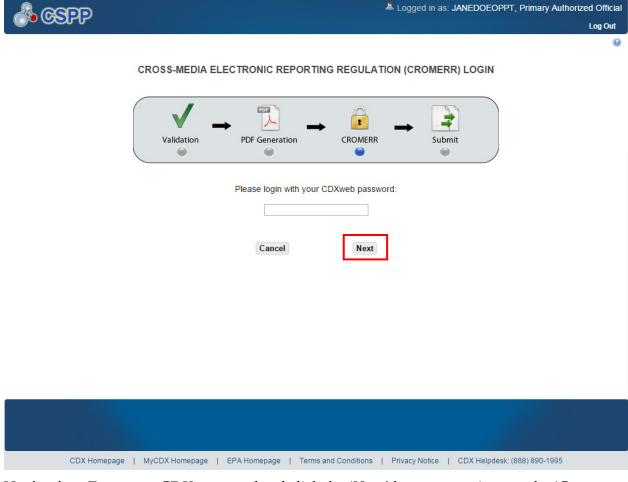
To submit the CDR Form U, log in to CDX using the credentials you provided during CDX registration:

• Password: Enter your CDX password



Exhibit 5 -38 shows a screen capture of the 'CROMERR Login' screen:

Exhibit 5-38: Cross-Media Electronic Reporting Regulation (CROMERR) Login Screen



Navigation: Enter your CDX password and click the 'Next' button to navigate to the 'Cross-Media Electronic Reporting Regulation (CROMERR) Security Question' screen.

5.3 CROMERR Security Question

The 'Cross-Media Electronic Reporting Regulation (CROMERR) Security Question' screen randomly selects and displays one (1) of the five (5) CROMERR eSIG-PIN questions that you answered on the 20-5-1 question screen during CDX registration.

eSIG-PIN Authorization Code: Provide the answer to the question that was pulled from the list of CDX registration security questions.

Primary Authorized Official

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Exhibit 5-39 shows a screen capture of the 'Cross-Media Electronic Reporting Regulation (CROMERR) Security Question' screen:

Exhibit 5-39: CROMERR Security Question Screen



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

5.4 Submit to EPA via CDX

On the 'Submit to CDX' screen, a certification message displays. Read the message and acknowledge by clicking the 'Confirm' button. Once you have clicked the 'Confirm' button, your CDR Form U will be submitted to EPA.



Exhibit 5 -40 shows a screen capture of the 'Submit to CDX' screen:

Exhibit 5-40: Submit to CDX Screen



Navigation: Click the 'Confirm' button to navigate to the 'Cross-Media Electronic Reporting Regulation (CROMERR) Submission' screen.

5.5 CROMERR Submission

On the 'Cross-Media Electronic Reporting Regulation (CROMERR) Submission' screen, a message displays indicating the submission has been successfully submitted to EPA via CDX.

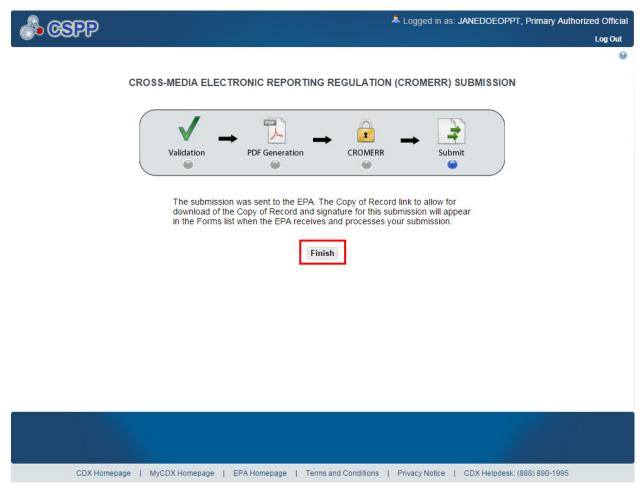
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Exhibit 5 -41 shows a screen capture of the 'Cross-Media Electronic Reporting Regulation (CROMERR) Submission' screen:

Exhibit 5-41: CROMERR Submission Screen



Navigation: Click the 'Finish' button to navigate back to the 'Home' screen. Click the 'Form U Access' link or tab to find your submitted CDR Form U. On the 'CDR Form U Access' screen, the form will have a status of 'Complete' under the 'Status' column. In addition to displaying a status of 'Complete,' a lock icon () will be displayed under the 'Action' column. Only a Primary AO can unlock a CDR Form U that has already been submitted. A Primary AO will need to unlock a CDR Form U before a Support can amend the form.



6 Download Copy of Record

You may obtain a copy of your submitted CDR Form U in accordance with CROMERR. Navigate to the 'CDR Form U Access' screen and locate a site for which you have successfully submitted a CDR Form U to download a Copy of Record (CoR). The form should have a status of 'Complete.'

Exhibit 6 -42 shows a screen capture of the 'CDR Form U Access' screen with the download arrow icon (♣) displayed:

Form U Access **User Management** Loa Out **CDR FORM U ACCESS** From this page, you can access 2012 and 2016 CDR Form Us for which you are either an Authorized Official or Support. The default view lists 2016 To open a Form U. click on the site name in the table below. The status of each Form U is located in the Status column: Not Started – indicates the Form U has not been started. Only an Authorized Official can initiate a Form U In Progress – indicates the Form U has been started but has not been submitted. Authorized Officials or Supports can access Form Us that are in progress. Submitted - indicates the Form U has been submitted and is locked. Unlock the Form U by clicking the lock icon and entering the correct passphrase when prompted. Be aware that resubmitting the Form U is amending and overwriting the previous submission. Only Authorized Officials can submit Form Us. To download a Copy of Record for a submitted Form U, click the green arrow icon and enter your passphrase when prompted. Reporting Year: 2016 ▼ Status: All Site: All Reporting Year Modify Date Submission Date Copy of Record Action Site Address Status 123 MAIN STREET SUITE 39 2016 FRS TEST FACILITY #38 Not Started FAIRFAX, VA 22030 1011 FAIRFAX 2016 11/13/2015 **TEST FACILITY** In Progress 11/13/2015 FAIRFAX, VA 22042 3903 FAIR RIDGE DR 2016 **TEST FACILITY TWO** In Progress 09/23/2015 FAIRFAX, VA 22033 4501 MARKET COMMONS DR In Progress 2016 TEST 3 02/17/2016 **OFAILED** FAIRFAX, VA 22033 123 MAIN STREET SUITE 128 FAIRFAX, VA 22030 Complete 02/09/2016 02/09/2016 2016 TEST FACILITY #97

In Progress

In Progress

02/17/2016

456 MAIN STREET SUITE 90

FAIRFAX, VA 22030 123 MAIN STREET SUITE 265 FAIRFAX, VA 22030

Exhibit 6-42: CDR Form U Access Screen (Copy of Record)

Logged in as: JANEDOEOPPT, Primary Authorized Official

Navigation: Click the download arrow icon (→) under the 'Copy of Record' column. You will be taken to the 'Enter Passphrase' screen to enter the passphrase associated with that CDR Form U. Once you have entered your passphrase, click the 'Next' button to navigate to the 'Cross-Media Electronic Reporting Regulation (CROMERR) LOGIN' screen. Enter your CDX login credentials and click the 'OK' button. If your login was successful, you will be taken to the 'Cross-Media Electronic Reporting Regulation (CROMERR) Security Question' screen. The 'Cross-Media Electronic Reporting Regulation (CROMERR) Security Question' screen

Refresh Form List

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TEST FACILITY 999

TEST FACILITY #98

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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 6-43 shows a screen capture of the 'Copy of Record' screen for downloading a CoR:

Exhibit 6-43: Copy of Record

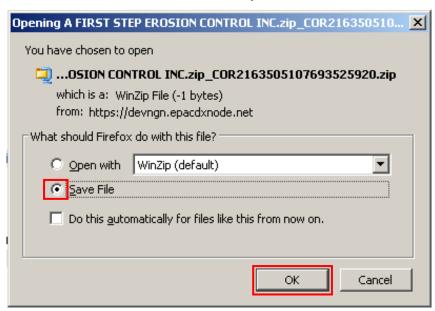


Click the download arrow icon (to download a PDF and an XML file of the CDR Form U. Upon clicking the download arrow icon (to a download prompt will be displayed asking you to save the files to your local hard drive. Click the 'Save File' button and click the 'OK' button to download and save the zip file to your local hard drive.



Exhibit 6 -44 shows a screen capture of the prompt screen:

Exhibit 6-44: Prompt Screen



If you click the download arrow icon (\P), you will download:

- A PDF version of the CDR Form U
- An XML version of the CDR Form U



7 Create an Amendment

To amend a submitted CDR Form U, navigate to the 'CDR Form U Access' screen and locate a site for which you previously submitted a CDR Form U. The form should display a status of 'Complete' under the 'Status' column. In addition to displaying a status of 'Complete,' the lock icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/lock.png" * MERGEFORMATINET
) will be displayed under the 'Action' column. Click the lock icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/lock.png" * MERGEFORMATINET
) under the 'Action' column to start an amendment.

Exhibit 7-45 shows a screen capture of the 'CDR Form U Access' screen displaying the lock (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/lock.png" * MERGEFORMATINET 1) icon:

Logged in as: JANEDOEOPPT, Primary Authorized Official Form U Access User Management Log Out **CDR FORM U ACCESS** From this page, you can access 2012 and 2016 CDR Form Us for which you are either an Authorized Official or Support. The default view lists 2016 To open a Form U. click on the site name in the table below. The status of each Form U is located in the Status column: Not Started – indicates the Form U has not been started. Only an Authorized Official can initiate a Form U. In Progress – indicates the Form U has been started but has not been submitted. Authorized Officials or Supports can access Form Us that are in progress. Submitted – indicates the Form U has been submitted and is locked. Unlock the Form U by clicking the lock icon and entering the correct passphrase when prompted. Be aware that resubmitting the Form U is amending and overwriting the previous submission. Only Authorized Officials can submit Form Us. To download a Copy of Record for a submitted Form U, click the green arrow icon and enter your passphrase when prompted. Reporting Year: 2016 ▼ Status: All Site: All Reporting Year Site Address Status Modify Date Submission Date Copy of Record Action 123 MAIN STREET SUITE 39 FAIRFAX, VA 22030 FRS TEST FACILITY #38 Not Started 1011 FAIRFAX 2016 TEST FACILITY 11/13/2015 In Progress 11/13/2015 FAIRFAX, VA 22042 3903 FAIR RIDGE DR TEST FACILITY TWO 2016 In Progress 09/23/2015 × FAIRFAX, VA 22033 4501 MARKET COMMONS DR 2016 TEST 3 In Progress 02/17/2016 ●FAIL ED FAIRFAX, VA 22033 123 MAIN STREET SUITE 128 2016 TEST FACILITY #97 Complete 02/09/2016 02/09/2016 FAIRFAX, VA 22030 456 MAIN STREET SUITE 90 2016 TEST FACILITY 999 In Progress 02/17/2016 FAIRFAX, VA 22030 123 MAIN STREET SUITE 265 **TEST FACILITY #98** 2016 In Progress 02/17/2016 FAIRFAX, VA 22030 Refresh Form List

Exhibit 7-45: CDR Form U Access – Amendment

Navigation: Click the lock icon (INCLUDEPICTURE "http://devngn.epacdxnode.net/cdx-oppt-iur/images/lock.png" * MERGEFORMATINET 🖆) under the 'Action' column to start an amendment.

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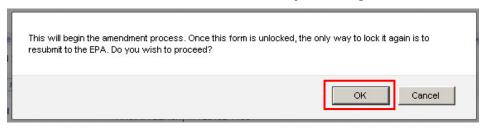


After clicking the lock icon (INCLUDEPICTURE

"http://devngn.epacdxnode.net/cdx-oppt-iur/images/lock.png" * MERGEFORMATINET •), you will receive a prompt to confirm the unlock process. If you unlock a CDR Form U, you will be required to resubmit the form to EPA after you finish making your changes. If you do not want to continue with the amendment, click the 'Cancel' button to cancel the amendment process and return to the 'CDR Form U Access' screen. Click the 'OK' button to close the prompt and continue with the amendment. Since the amended form takes the place of the original form, be sure that the amended form contains all of the information that needs to be submitted.

Exhibit 7 -46 shows a screen capture of the unlock prompt:

Exhibit 7-46: Unlock Prompt Message



After you click the 'OK' button, you will be taken to the 'Enter Passphrase' screen. You must enter the passphrase that was originally associated with the CDR Form U to start the amendment process. After you enter the passphrase and click the 'Next' button you will be taken to the 'Amendment and Late Submission Explanation' screen.

At this point, the 'CDR Form U Access' screen will display a status of 'In Progress' under the 'Status' column, and the unlocked icon (INCLUDEPICTURE

"http://devngn.epacdxnode.net/cdx-oppt-iur/images/unlock.png" * MERGEFORMATINET •) will be displayed under the 'Action' column; however, you will not see these changes until you navigate back to the 'CDR Form U Access' screen.

7.1 Amendment and Late Submission Explanation

Before you begin editing or completing the form, you must provide an explanation as to why you are amending the original form. You can access the 'Amendment and Late Submission Explanation' screen by clicking the 'Explanation' link located under the 'Amendment and Late Submission' folder within the navigation tree.



Exhibit 7 -47 shows a screen capture of the 'Explanation' link in the navigation tree:

Exhibit 7-47: Explanation Link

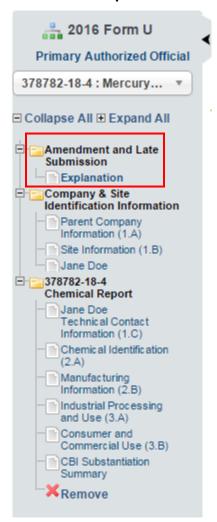
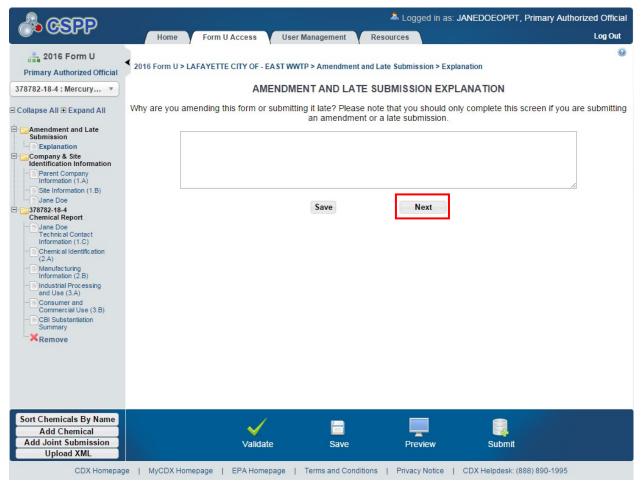




Exhibit 7 -48 shows a screen capture of the 'Amendment and Late Submission Explanation' screen:

Exhibit 7-48: Amendment and Late Submission Explanation Screen



Once you finish editing the CDR Form U and provide an explanation on the 'Amendment and Late Submission Explanation' screen, click the 'Next' button to make any necessary edits.



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 'Home' screen. The 'Resources' screen provides you with links to the application e-CDRweb user guide as well as links to additional resources. Click the 'User Guide' link to access the e-CDRweb user guide document.

Chemical Data Reporting Homepage: If you click this link, a new Internet browser window will display the CDR Homepage.

CDX Homepage: If you click on this link, a new Internet browser window will display the CDX Homepage.

TSCA Chemical Substances Inventory: If you click on this link, a new Internet browser window will display the 'TSCA Chemical Substances Inventory' screen.

Exhibit 8 -49 shows a screen capture of the 'Resources' screen:

RESOURCES

e-CDRweb User Guide
This guide describes each screen of the e-CDRweb application and provides information on how to use the system to complete 2016 CDR Form U. The guide also contains instructions for registering with CDX, submitting a joint submission, and amending a previous submission. You can download the guide for quick reference.

Helpful Web Links
Chemical Data Reporting Homepage - access the primary source of information related to Chemical Data Reporting (CDR).

CDX Homepage - access the primary source of information related to Central Data Exchange (CDX).

TSCA Chemical Substances Inventory - access information related to Toxic Substances Control Act (TSCA) Inventory.

Please direct questions regarding accessing your form, managing the access rights, or your particular role as an Authorized Official or Support to (202) 554-1404 or e-mail the TSCA-Hotline at TSCA-Hotline@epamail.epa.gov.

For questions regarding completing your Form U, please email ecDRweb@epa.gov.

Exhibit 8-49: Resources Screen

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Appendix A. Acronyms and Abbreviations

The following exhibit displays all the acronyms and abbreviations used in this document:

| Acronym | Full Name |
|----------|---|
| AO | Authorized Official |
| CA | Chemical Abstract |
| CASRN | Chemical Abstract Service Registry Number |
| СВІ | Confidential Business Information |
| CDR | Chemical Data Reporting |
| CDX | Central Data Exchange |
| CoR | Copy of Record |
| CROMERR | Cross-Media Electronic Reporting Regulation Security System |
| CSPP | Chemical Safety and Pesticide Programs |
| D&B | Dun and Bradstreet |
| EST | Eastern Standard Time |
| EPA | Environmental Protection Agency |
| e-CDRweb | Electronic-Chemical Data Reporting web |
| ID | Identifier |
| IS | Industrial Sector |
| NKRA | Not Known or Reasonably Ascertainable |
| OPPT | Office of Pollution Prevention and Toxics |
| PDF | Portable Document Format |
| SRS | Substance Registry Services |
| TSCA | Toxic Substances Control Act |
| U.S. | United States |
| XML | Extensible Markup Language |

Exhibit 8-50: Acronyms and Abbreviations