

**Section 8(b) Notice of Activity
Application and Tooltip Text
Environmental Protection Agency
Office of Pollution Prevention and Toxics**



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Revision Log

Date	Version No.	Description	Author	Reviewer	Review Date
06/12/2017	0.01	Initial Draft of OPPT Section 8(b) Notice to Activity Application Instructional Text	C. Yeh	M. Seavey	06/12/2017

1 Introduction

1.1 Document Purpose

The purpose of this document is to provide the Office of Pollution Prevention and Toxics (OPPT) with examples of the instructional and tooltip text used throughout the Section 8(b) Notice of Activity application. This document provides screenshots that illustrate the identified text as it will display within the application.

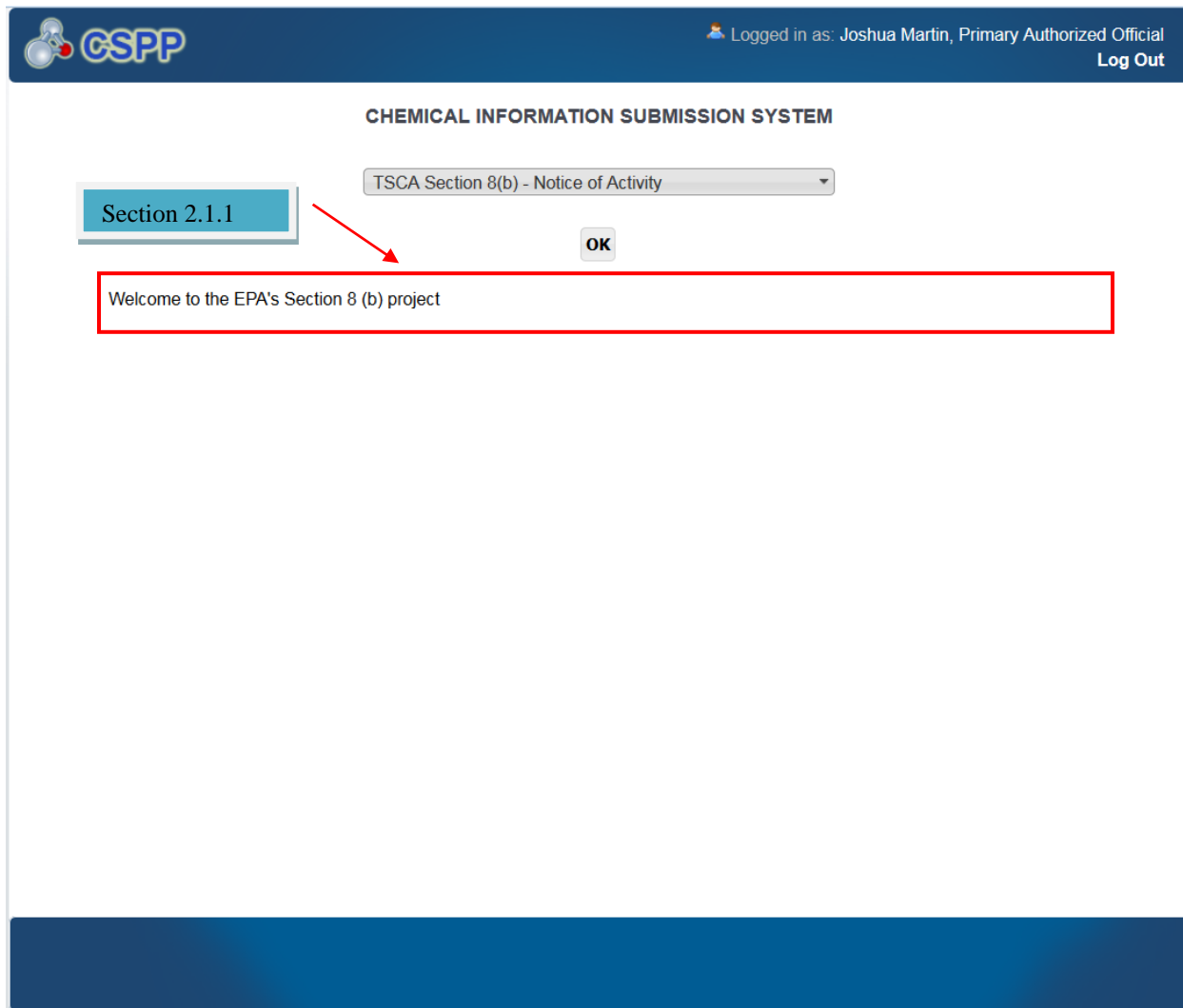
It is CGI's goal that OPPT can utilize this document to provide updates and feedback on the supplied text for the Section 8(b) Notice of Activity application. Instructional and tooltip text that requires OPPT's guidance is denoted in italicized font. Once OPPT provides guidance, CGI will incorporate it into this document and the Section 8(b) Notice of Activity application.

2 Instructional and Tooltip Text for Section 8(b) Notice of Activity

This section illustrates examples of instructional text that will display on each screen located within the Section 8(b) Notice of Activity application. This section includes tooltip text that will display for each field for the Notice of Activity-A (NAA) and Notice of Activity-B (NAB) forms within the Section 8(b) Notice of Activity application.

2.1 Chemical Information Submission System (CISS) Screen

Exhibit 2-1 Chemical Information Submission System



2.1.1 Chemical Information Submission System Screen Instructional Text

Welcome to the EPA's Chemical information Submission System. To begin a submission, please select an application from the drop-down menu.

Screen Text for Section 8(b) Notice of Activity Drop-Down Menu Selection:

"Welcome to the EPA's Section 8(b) project."

This language for this section is to be provided by EPA.

2.2 Section 8(b) Notice of Activity Home Screen

Exhibit 2-2 TSCA Section 8(b) 'Home'

2.2.1 Section 8(b) Notice of Activity Home Screen Instructional Text

Create a Section 8(b) Form

- Please select a form type and click 'Create New Form' button.

Useful Resources

- Section 8(b) User Guide

Submission History

- You have no submissions so far.

2.2.2 Section 8(b) Notice of Activity Home Screen Tooltip Text

- **Useful Resources:** Click the various links to access the displayed document.
- **Submission History:** Access in-progress or completed forms in the 'Submission History' section.
- **Form Type:** Contains the possible form types that can be created, including 'Section 8(b) Notice of Activity – A (NAA)' and 'Section 8(b) Notice of Activity – B (NAB).'
- **Create New Form:** Click this button to start a new form for the selected form type and navigate to the 'Create Passphrase' screen.

2.3 User Management Screen

Exhibit 2-3 User Management

The screenshot shows the 'User Management' interface. At the top, there is a navigation bar with 'HOME' and 'USER MANAGEMENT' links, and a user profile for 'Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)'. Below the navigation bar, the main content area is titled 'User Management'. A red box highlights the 'Form Alias' dropdown menu and the 'Form Information' section, with a callout 'Section 2.3.1' pointing to it. Another red box highlights the 'Assign Supports' section, which includes 'Unassigned' and 'Assigned' lists, 'Add', 'Remove', and 'Save' buttons, with a callout 'Section 2.3.2' pointing to it. The footer contains links for 'Raise a Bug', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

2.3.1 User Management Screen Instructional Text

The Authorized Official is responsible for restricting a Support's access to select forms by assigning or un-assigning them. The Support can access and edit only those forms for which the Authorized Official has granted access. Select a specific form from the Form Alias drop-down menu and assign a Support to the form by highlighting the individual and clicking the **Add** button. To un-assign a Support, highlight the individual and click the **Remove** button. To highlight and assign or un-assign multiple Supports, hold down the **Ctrl** or **Shift** keys on the keyboard and click each Support before moving. You must click the **Save** button after each assignment.

2.3.2 User Management Screen Tooltip Text

- **Form Alias:** Select a form alias from the drop-down menu to select the support user(s) that will have access to the form.
- **Form Alias:** Displays the form alias of the form selected from the 'Form Alias' drop-down menu.
- **Unassigned:** Contains the registered Support(s) and/or Primary Agent(s)/Consultant(s) associated with the Primary Authorized Official (AO) who can potentially be assigned to access and edit the selected form. To move support persons from the 'Unassigned' group box to the 'Assigned' group box, highlight an individual or multiple support persons and click the 'Add >>' button. To highlight multiple support persons, hold down the <Ctrl> key on your keyboard while clicking each Support and/or Primary Agent/Consultant. To highlight

multiple consecutive support persons, hold down the <Shift> key on your keyboard while clicking the first and last support person in the list.

- **Assigned:** Contains the registered Support(s) and/or Primary Agent(s)/Consultant(s) given permission by the AO to access and edit the selected form. This group box shows all support persons assigned to complete the Section 5 Notices and Supports form for a single form alias. To move Supports and/or Primary Agents/Consultants from the ‘Assigned’ group box to the ‘Unassigned’ group box, highlight individual or multiple support persons and click the ‘<< Remove’ button. To highlight multiple support persons, hold down the <Ctrl> key on your keyboard while clicking each Support and/or Primary Agent/Consultant. To highlight multiple consecutive support persons, hold down the <Shift> key on your keyboard while clicking the first and last support person in the list.
- **Add >>:** Click the button to move Supports and/or Primary Agents/Consultants from the ‘Unassigned’ box to the ‘Assigned’ box.
- **<< Remove:** Click the button to move Supports and/or Primary Agents/Consultants from the ‘Assigned’ box to the ‘Unassigned’ box.
- **Save:** Click the button to save the form assignment made.

2.4 Submission History

Exhibit 2-4 Submission History

Section 2.4.2

Submission History

Show 10 entries Search:

Form Alias	Form Type	Case Number	Submission Date	Status	Copy of Record	Action
NAA-20170524-12:56:31	Notice of Activity - A (NAA)			In Progress		✘
NAB-20170524-13:04:39	Notice of Activity - B (NAB)			In Progress		✘

Export Options: XML CSV PDF Excel

Previous 1 Next

2.4.1 Submission History Instructional Text

There is no instructional text for the ‘Submission History’ table.

2.4.2 Submission History Tooltip Text

- **Previous/Next:** Click the navigation arrows to view in-progress and completed submissions created within an organization.
- **Show entries:** Select a value from the drop-down menu to view a specific number of forms per page.
- **Form Alias:** Displays the form alias provided by a user for a specific form. The 'Form Alias' column displays a default alias comprised of a form type, date stamp, and time stamp. A form alias helps a user or company to differentiate between multiple forms.
- **Form Type:** Displays the form type. This column can contain the following values: Notice of Activity – A (NAA) or Notice of Activity – B (NAB).
- **Case Number:** Displays the form case number(s) pertaining to the reported form after EPA receives the submission.
- **Submission Date:** Displays the date that a user completes the submission and sends it to EPA via CDX. This date populates only after a user submits the completed form.
- **Status:** Displays the status of the Section 8(b) Notice of Activity form. The values will display as 'In Progress,' 'Submitted,' 'Failed,' or 'Completed.'
- **Copy of Record:** Displays a green 'Arrow' icon for a user to download a copy of record after the form has a status of 'Completed.'
- **Action:** Displays a 'Delete' icon for all forms with a status of 'In Progress.' Displays a 'Lock' icon for all forms that have been submitted. Displays an 'Unlocked' icon for all forms that have been unlocked to submit an amendment.
- **Export Options:** Displays 'CSV,' 'Excel,' 'XML,' and 'PDF' buttons for a user to export and download the 'Section 8(b) Notice of Activity' table in one of the following formats: Comma-Separated-Values (CSV), Excel (XLSX), Extensible Markup Language (XML), or Portable Document Format (PDF).
 - **XML:** Click the 'XML' button to download an .xml file of the 'Submission History' table.
 - **CSV:** Click the 'CSV' button to download a .csv file of the 'Submission History' table.
 - **PDF:** Click the 'PDF' button to download a .pdf file of the 'Submission History' table.
 - **Excel:** Click the 'Excel' button to download an .xlsx file of the 'Submission History' table.

2.5 Create Passphrase Screen

Exhibit 2-5 Create Passphrase

2.5.1 Create Passphrase Screen Instructional Text

You are responsible for remembering your passphrase!

If you lose or forget your passphrase, you will not be able to access your Section 8(b) Form to print, submit, or make changes. You will need to complete a new Section 8(b) Form and create a new passphrase for the form. For security reasons, the system administrator will not have access to your passphrase and will not be able to retrieve or reset it.

2.5.2 Create Passphrase Screen Tooltip Text

- **New Passphrase:** Enter a passphrase that is between 8 to 20 characters. For maximum security, your passphrase should contain a combination of letters and numbers. Your passphrase should not contain special characters (for example, +, ?, and *). As a Primary user, you are responsible for remembering your passphrase and distributing it to authorized individuals only. The passphrase is used as an encryption key to protect the contents of the form data.
- **Confirm Passphrase:** Enter the same passphrase that was entered into the ‘New Passphrase’ field. The same passphrase may be associated with multiple forms. The user can choose to have the same passphrase for all forms. Supports do not have the ability to start a new form or create a passphrase for a form.
- **Continue:** Click the ‘Continue’ button to navigate to the ‘Technical Contact Information’ screen in a Section 8(b) Notice of Activity form.

- **Cancel:** Click the ‘Cancel’ button to stop the passphrase creation process and navigate back to the TSCA Section 8(b) Notice of Activity ‘Home’ page.

2.6 Enter Passphrase Screen

Exhibit 2-6 Enter Passphrase

2.6.1 Enter Passphrase Screen Instructional Text

You are responsible for remembering your passphrase!

If you lose or forget your passphrase, you will not be able to access your Section 8(b) Form to print, submit, or make changes. You will need to complete a new Section 8(b) Form and create a new passphrase for the form. For security reasons, the system administrator will not have access to your passphrase and will not be able to retrieve or reset it.

2.6.2 Enter Passphrase Screen Tooltip Text

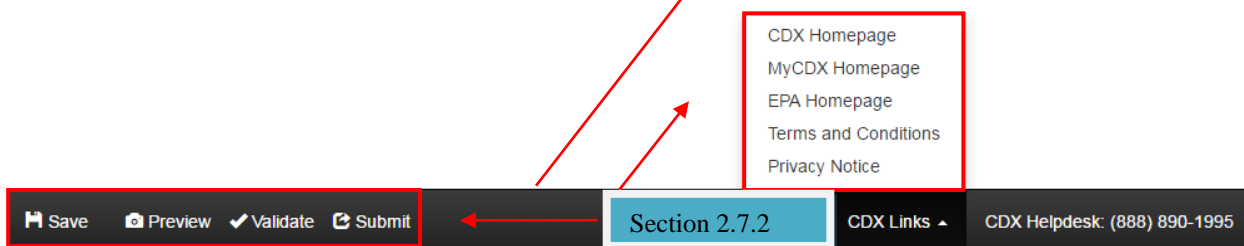
- **Form Alias:** Displays the form alias that is used to identify the form.
- **Enter Passphrase:** Enter the same passphrase that was used to originally create the form. For security reasons, the system administrator does not have access to the passphrase and cannot retrieve it or reset it to a new one. If a user has forgotten the passphrase, a new form will need to be created with a new passphrase.
- **Continue:** Click the ‘Continue’ button to navigate to the ‘Technical Contact Information’ screen.
- **Cancel:** Click the ‘Cancel’ button to navigate back to the TSCA Section 8(b) Notice of Activity ‘Home’ page.

2.7 Application Header/Footer

Exhibit 2-7 Application Header/Footer



Exhibit 2-8 Application Footer



2.7.1 Application Header/Footer Instructional Text

N/A

2.7.2 Application Header/Footer Tooltip Text

- **Home:** Click the ‘Home’ link to navigate to the Section 8(b) Notice of Activity ‘Home’ screen at any point.
- **User Management:** Click the ‘User Management’ link to navigate to the ‘User Management’ page.
- **User ID:** Displays the logged in user’s name, role, and organization. Click the User ID to log out of the application.
- **Save:** Click the ‘Save’ link to save the data entered into form. A ‘Successfully saved’ pop-up message appears on the current page.
- **Preview:** Click the ‘Preview’ link to select the option to view a regular PDF or a sanitized PDF in a separate window.
- **Validate:** Click the ‘Validate’ link to perform global validation on the contents of the 8(b) Notice form, save the entire form, and display applicable error messages within the ‘TSCA Section 8(b)’ window.
- **Submit:** Click the ‘Submit’ link to initiate the submission process for an 8(b) Notice form.
- **CDX Links:** Click ‘CDX Links’ to access a link to the ‘CDX Homepage,’ ‘MyCDX’ page, ‘EPA Homepage,’ ‘CDX Terms and Conditions,’ and ‘CDX Privacy Notice’ page.
 - **CDX Homepage:** Click the ‘CDX Homepage’ link to display the CDX homepage in a separate browser tab.
 - **MyCDX:** Click the ‘MyCDX’ link to display the MyCDX page in a separate browser tab.
 - **EPA Homepage:** Click the ‘EPA Homepage’ link to display the EPA homepage in a separate browser tab.
 - **CDX Terms and Conditions:** Click the ‘CDX Terms and Conditions’ link to display the Terms and Conditions page in a separate browser tab.

- **CDX Privacy Notice:** Click the ‘CDX Privacy Notice’ link to display the ‘Warning Notice and Privacy Policy’ page in a separate browser tab.

2.8 Add Chemical using SRS Window

Exhibit 2-9 Add Chemical using SRS

2.8.1 Add Chemical using SRS Window Instructional Text

Enter search term here...

2.8.2 Add Chemical using SRS Tooltip Text

- **CASRN:** Select the ‘CASRN’ radio button to search SRS using an entered Chemical Abstracts Service Registry Number.
- **TSCA Inventory Name:** Select the ‘TSCA Inventory Name’ radio button to search SRS using the chemical inventory name.
- **Accession Number:** Select the ‘Accession Number’ radio button to search SRS using an accession number.
- **Generic Name:** Select the ‘Generic Name’ radio button to search SRS using a generic chemical name.
- **Begins With / Contains / Matches Exactly:** Select a value from the drop-down menu to determine how the search criteria will be applied to the SRS database search.
- **Search:** Click the ‘Search’ button to initiate the database search for the search criteria for the desired chemical.

-
- **Save:** Click the ‘Save’ button to populate the selected chemical into the ‘Chemicals’ table.
 - **Cancel:** Click the ‘Cancel’ button to close the ‘Add Chemical using SRS’ window without searching for a chemical or saving a selected chemical result.

3 Create Section 8(b) Notice of Activity (NAA & NAB) Form

This section illustrates examples of instructional text to be displayed on each screen located within the Section 8(b) Notice of Activity application for a Notice of Activity – A (NAA) and Notice of Activity – B (NAB) form. This section also includes tool tip text that displays for specific fields.

3.1 Technical Contact Information Screen

Exhibit 3-1 Technical Contact Information

3.1.1 Technical Contact Information Screen Instructional Text

Please do not include CBI information in the Submission Alias field.

3.1.2 Technical Contact Information Screen Tooltip Text

- **Submission Alias:** Enter a form alias to differentiate/identify this form.
- **Copy from CDX:** Click the link to populate CDX user information into the technical contact fields.
- **First Name:** Enter the first name of the technical contact.
- **Last Name:** Enter the last name of the technical contact.
- **Phone Number:** Enter the 10-digit phone number of the technical contact using only numbers.

- **Continue:** Click the ‘Continue’ button to navigate to the ‘Chemical Information’ screen.
- ### 3.2 Chemical Information (Notice of Activity – NAA) Screen

Exhibit 3-2 Chemical Information (Scroll 1)

HOME USER MANAGEMENT
Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

TSCA Section 8(b) ▶ NAA-20170524-12:56:31

Step 1 Step 2 Step 3

Technical Contact **Chemical Information** Submitting Official Information

Chemical Information

Add Chemical using SRS

Upload Chemical(s) using .CSV file

Chemicals

Search:

CASRN	TSCA Inventory Name	Registry Name	Action
51-811-791	Poly(oxy-1,2-ethanedyl), .alpha.-(nonylphenyl)-.omega.-hydr...	Polyethylene glycol nonylphenyl ether phosphate	

Export options:

Search:

Accession	PMN	Maintain Existing CBI

[Raise a Bug](#)
[CDX Links](#)
[CDX Helpdesk: \(888\) 890-1995](#)

Exhibit 3-3 Chemical Information (Scroll 2)

Section 3.2.2

CASRN	TSCA Inventory Name	Registry Name	Action
51-811-791	Poly(oxy-1,2-ethanediy), .alpha.-(nonylphenyl)-omega.-hydr...	Polyethylene glycol nonylphenyl ether phosphate	

Export options: XML CSV PDF Excel

Accession Number	PMN Number	Generic Name	Maintain Existing CBI Claim?	Action
164331	P000008	Emulsion polymer (PROVISIONAL)	N	
232689	P000005	Polymeric MDI based polyurethane (PROVISIONAL)	Y	

Export options: XML CSV PDF Excel

Previous Next

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

3.2.1 Chemical Information Screen Instructional Text

There is no instructional text on the 'Chemical Information' screen.

3.2.2 Chemical Information Screen Tooltip Text

- **Add Chemical using SRS:** Click the button to search for and select a chemical from Substance Registry Services (SRS).
- **Upload Chemical(s) using .CSV file:** Click the button to perform a bulk upload of chemicals via a formatted .csv file.
- **CASRN:** Displays the CASRN of the chemical identified from SRS.
- **TSCA Inventory Name:** Displays the TSCA Inventory Name of the chemical identified from SRS.
- **Registry Name:** Displays the SRS registry name of the selected chemical.
- **Action:** Click the 'Edit' icon to generate the 'Add Chemical using SRS' window to modify the chemical information and associated CBI claims. Click the 'Delete' icon to delete the specified chemical.
- **Search:** Enter search criteria to filter the displayed chemical substances.
- **Export Options:** Click the 'XML,' 'CSV,' 'PDF,' or 'Excel' buttons to generate an .xml, .csv, .pdf, or .xlsx file of the 'Chemicals' table.
- **Accession Number:** Displays the accession number of the identified chemical.

- **PMN Number:** Displays the PMN number of the identified chemical.
- **Generic Name:** Displays the generic name of the identified chemical.
- **Maintain Existing CBI Claim:** Displays a ‘Y’ or ‘N’ that indicates whether the confidentiality status of the identified chemical will be maintained.
- **Action:** Click the ‘Edit’ icon to edit the chemical in the respective row. Click the ‘Delete’ icon to delete the chemical in the respective row.
- **Previous:** Click the ‘Previous’ button to save the entered chemical information and navigate to the ‘Technical Contact Information’ screen.
- **Next:** Click the ‘Next’ button to save the chemical information and navigate to the ‘Submitting Official Information’ screen.

3.3 Add Chemical using SRS (Notice of Activity – NAA) Window

Exhibit 3-4 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 1)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

12

CASRN TSCA Inventory Name Accession Number Generic Name

Begins With Search

+ Chemical Identifier: 12818
 + Chemical Name: Isodecene
 I am seeking to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the TSCA Inventory.
 I am not seeking to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the TSCA Inventory.

Name of Authorized Official/Mailing address: CBI

Company Name/Mailing Address: CBI

Technical Contact/Telephone Number (in U.S.): CBI

Show questions

Section 3.3.2 Save Cancel

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-5 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 2)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

A. REQUIRED FOR ANY IDENTIFIED CBI CLAIM IN PART I

1. Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c) (2)?

If you answered yes, you must identify the specific information element(s), specify the applicable exemption(s), and answer no further questions with respect to that/those information element(s). For any information element that is not exempt, please respond to all of the questions below.

If the Agency disagrees with this assertion, you may be asked to provide additional information to support your claim.

Yes

No

2. Will disclosure of any information element claimed as CBI likely result in substantial harm to your business's competitive position?

If you answered yes, please describe with specificity the substantial harmful effects that would result to your competitive position if the CBI element is made available to the public.

If, for example, it is not publicly known that the submitter manufactures, imports or processes the reported chemical, describe with specificity the harmful effects that would result if this information were made available to the public. If you are claiming technical contact name or name of authorized official as CBI, describe with specificity the harmful effects that would result if this information were made available to the public.

Section 3.3.2 Save Cancel

Number Number Generic Name CBI Claim? Action

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-6 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 3)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

If you are claiming multiple information elements as CBI, please provide information for EACH element you identified above. If a single substantiation response applies for all information claimed as CBI, you should indicate this in your substantiation response.

Yes

No

3. To the extent your business has disclosed any information to others (both internally and externally), what precautions has your business taken? Please identify the measures or internal controls your business has taken to protect the information claimed as confidential.

1. Non-disclosure agreement required prior to access. Yes No

2. Access is limited to individuals with a need-to-know Yes No

3. Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.). Yes No

4. Other internal control measure(s). If yes, please explain below Yes No

Section 3.3.2 Save Cancel

Number Number Generic Name CBI Claim? Action

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-7 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 4)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

4. Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public?

If you answered yes, please explain why the information should be treated as confidential.

Yes

No

5. If you assert a claim of confidentiality that is intended to last less than 10 years (see TSCA section 14(e)(1)(B)ii), then please indicate the number of years (between 1-10 years) or specific date/occurrence after which the claim is withdrawn?

6. Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance?

If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination.

Yes

Section 3.3.2 Save Cancel

Number Number Generic Name CBI Claim? Action

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-8 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 5)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination.

Yes

No

B. APPLICABLE ONLY TO CHEMICAL IDENTITY CBI CLAIMS

1. Are you seeking to maintain a specific confidential chemical identity as CBI?

If you answered yes, please respond to questions below.

If you answered no, please leave all questions below blank.

Yes

No

Section 3.3.2 Save Cancel

Number Number Generic Name CBI Claim? Action

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-9 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 6)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

2. Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI?
 If you answered yes, please respond to questions below.
 If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C).

Yes
 No

3. Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States?
 If you answered yes, please explain why the information should be treated as confidential.

Yes
 No

Section 3.3.2 Save Cancel

Number Number Generic Name CBI Claim? Action

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-10 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 7)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

2. Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI?
 If you answered yes, please respond to questions below.
 If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C).

Yes
 No

I understand that I am choosing to supply substantiations at this time for my CBI claims for specific chemical identity.

3. Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States?
 If you answered yes, please explain why the information should be treated as confidential.

Yes
 No

Section 3.3.2 Save Cancel

Number Number Generic Name CBI Claim? Action

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-11 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 8)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

2. Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI?
If you answered yes, please respond to questions below.
If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C).

Yes
 No

I understand that I am choosing not to supply substantiations at this time for my CBI claim for specific chemical identity. Substantiations for a CBI claim for specific chemical identity must be supplied later according to the Review Plan required under TSCA.

3. Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States?
If you answered yes, please explain why the information should be treated as confidential.

Yes
 No

Section 3.3.2 Save Cancel

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-12 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 9)

3.3.1 Add Chemical using SRS (Notice of Activity – NAA) Window Instructional Text

There is no instructional text on the ‘Add Chemical using SRS’ window.

3.3.2 Add Chemical using SRS (Notice of Activity – NAA) Window Tooltip Text

- **Chemical Identifier:** Display the chemical identifier of the selected chemical
- **Chemical Name:** Displays the name of the selected chemical.
- **I am seeking to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the TSCA Inventory:** Select the radio button to maintain the CBI claim of the identified chemical substance.
- **I am not seeking to maintain an existing claim for the confidential of the chemical substance identity, as listed on the TSCA Inventory:** Select the radio button to not maintain the CBI claim of the identified chemical substance.
- **Name of Authorized Official / Mailing address - CBI:** Check the ‘CBI’ checkbox to claim the authorized official and mailing address information as confidential.
- **Company Name / Mailing Address - CBI:** Check the ‘CBI’ checkbox to claim the company name and mailing address information as confidential.
- **Technical Contact / Telephone Number (in U.S.) - CBI:** Check the ‘CBI’ checkbox to claim the technical contact information as confidential.
- **Show questions:** Check the checkbox to display the chemical element and non-chemical element CBI substantiation questions.

- **Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)i?** – **Yes:** Select the radio button to indicate that any information element that is claimed as CBI is exempt from substantiation.
- **Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)i** – **No:** Select the radio button to indicate that information elements claimed as CBI are subject to substantiation and respond to the subsequent substantiation questions.
- **Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)i** – **text box:** Enter text to provide reasoning behind the specific information elements that are not subject to substantiation and applicable exemption(s).
- **Will disclosure of any information element claimed as CBI likely result in substantial harm to your business’s competitive position** – **Yes:** Select the ‘Yes’ radio button to indicate that disclosure of CBI information would result in substantial harm to your business’s competitive position.
- **Will disclosure of any information element claimed as CBI likely result in substantial harm to your business’s competitive position** – **No:** Select the ‘No’ radio button to indicate that disclosure of any CBI elements would not result in substantial harm to your business’s competitive position.
- **Will disclosure of any information element claimed as CBI likely result in substantial harm to your business’s competitive position** – **text box:** Enter information to provide specific examples of the substantial harm that would result to the business’s competitive position if the CBI element is made available to the public.
- **To the extent your business has disclosed any information to others (both internally and externally), what precautions has your business taken? Please identify the measures or internal controls your business has taken to protect the information claimed as confidential.**
 - **Non-disclosure agreement required prior to access** – **Yes:** Select the ‘Yes’ radio button to indicate that your business has issued non-disclosure agreements required prior to accessing confidential information.
 - **Non-disclosure agreement required prior to access** – **No:** Select the ‘No’ radio button to indicate that your business has not issued non-disclosure agreements required prior to accessing confidential information.
 - **Access is limited to individuals with a need-to-know** – **Yes:** Select the ‘Yes’ radio button to indicate that access to information claimed as confidential is limited to individuals with a need-to-know basis.
 - **Access is limited to individuals with a need-to-know** – **No:** Select the ‘No’ radio button to indicate that access to information claimed as confidential is not limited to individuals with a need-to-know basis.
 - **Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.)** – **Yes:** Select the

‘Yes’ radio button to indicate that information claimed as confidential is physically or electronically secured.

- **Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.) – No:** Select the ‘No’ radio button to indicate that information claimed as confidential is not physically or electronically secured.
 - **Other internal control measure(s). If yes, please explain below – Yes:** Select the ‘Yes’ radio button to indicate that other internal control measures are utilized to protect confidential information.
 - **Other internal control measure(s). If yes, please explain below – No:** Select the ‘No’ radio button to indicate that no other internal control measures are utilized to protect confidential information.
 - **Other internal control measure(s). If yes, please explain below – text box:** Enter information to explain other internal control measures that are used to protect confidential information.
- **Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public? If you answered yes, please explain why the information should be treated as confidential – Yes:** Select the ‘Yes’ radio button to indicate that information claimed as confidential has appeared in media or other publications that have been made available to the general public.
 - **Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public? If you answered yes, please explain why the information should be treated as confidential – No:** Select the ‘No’ radio button to indicate that information claimed as confidential has not appeared in any media or publications that have been made available to the general public.
 - **Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public? If you answered yes, please explain why the information should be treated as confidential – text box:** Enter reasoning to explain why information claimed as confidential that has been made available to the general public via media or other publications should be treated as confidential.
 - **If you assert a claim of confidentiality that is intended to last less than 10 years (see TSCA section 14(e)(1)(B)ii), then please indicate the number of years (between 1-10 years) or specific date/occurrence after which the claim is withdrawn – text box:** Enter the number of years/date/occurrence if you assert a claim of confidentiality that is intended to last less than 10 years after which the confidentiality claim is withdrawn.
 - **Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If you answered yes, please**

explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination – Yes: Select the ‘Yes’ radio button to indicate that EPA/another federal agency/court has made a confidentiality determination regarding information associated with the chemical substance.

- **Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination – No:** Select the ‘No’ radio button to indicate that EPA/another federal agency/court has not made a confidentiality determination regarding information associated with the chemical substance.
- **Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination – text box:** Enter information to explain the outcome of a confidentiality determination associated with the chemical substance.
- **Are you seeking to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank – Yes:** Select the ‘Yes’ radio button to indicate that you are seeking to maintain a specific confidentiality chemical identity as CBI.
- **Are you seeking to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank – No:** Select the ‘No’ radio button to indicate that you are not seeking to maintain a specific confidentiality chemical identity as CBI.
- **Are you seeking to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank – text box:** Enter data to provide information with regards to maintaining a specific confidential chemical identity as CBI.
- **Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C) – Yes:** Select the ‘Yes’ radio button to indicate that you are choosing to supply substantiation information at this time for the CBI claim for a specific chemical identity. ‘I understand that I am choosing to supply substantiations at this time for my CBI claims for specific chemical identity’ displays above the text box.
- **Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C) – No:** Select the ‘No’ radio button to indicate that you are choosing not to supply substantiation information at this time for the CBI claim

for a specific chemical identity and will bypass validation for the substantiation fields. The chemical will not be removed from the confidential portion of the TSCA inventory. 'I understand that I am choosing not to supply substantiations at this time for my CBI claim for specific chemical identity. Substantiations for a CBI claim for specific chemical identity must be supplied later according to the Review Plan required under TSCA.' displays above the text box when 'No' is selected.

- **Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C) – text box:** Enter data to provide additional information regarding substantiation information for a chemical identity.
- **Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States? If you answered yes, please explain why the information should be treated as confidential – Yes:** Select the 'Yes' radio button to indicate that the confidential chemical substance is known to have been offered for commercial distribution in the United States.
- **Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States? If you answered yes, please explain why the information should be treated as confidential – No:** Select the 'No' radio button to indicate that the confidential chemical substance has not been offered for commercial distribution in the United States.
- **Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States? If you answered yes, please explain why the information should be treated as confidential – text box:** Enter text to provide reasoning with regards to why a confidential chemical substance offered for commercial distribution in the United States should be treated as confidential.
- **Do you wish to claim this substantiation as CBI? By marking yes, you are certifying to the truth of the below statements – Yes:** Select the 'Yes' radio button to indicate that the information entered is accurate and truthful.
- **Do you wish to claim this substantiation as CBI? By marking yes, you are certifying to the truth of the below statements – No:** Select the 'No' radio button to indicate that you are not marking the substantiation information as CBI and that your statements may not be accurate.

3.4 Add Chemical using SRS (Notice of Activity – NAB) Window

Exhibit 3-13 Add Chemical using SRS (Notice of Activity – NAB) (Scroll 1)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

Enter search terms here ...

CASRN TSCA Inventory Name Accession Number Generic Name

Begins With

Chemical Identifier: 123898

Chemical Name: Aliphatic epoxy monomer

I am seeking to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the TSCA Inventory.

I am not seeking to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the TSCA Inventory.

Anticipated Date of Re-entry of Chemical Substance in U.S. Commerce

CBI

Please enter a Start Date on or after 2016-06-22

Name of Authorized Official/Mailing address: CBI

Company Name/Mailing Address: CBI

Section 3.4.2

Accession PMN CBI

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-14 Add Chemical using SRS (Notice of Activity – NAB) (Scroll 2)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

Technical Contact/Telephone Number (in U.S.): CBI

Show questions

A. REQUIRED FOR ANY IDENTIFIED CBI CLAIM IN PART I

1. Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)?

If you answered yes, you must identify the specific information element(s), specify the applicable exemption(s), and answer no further questions with respect to that/those information element(s). For any information element that is not exempt, please respond to all of the questions below.

If the Agency disagrees with this assertion, you may be asked to provide additional information to support your claim.

Yes

No

2. Will disclosure of any information element claimed as CBI likely result in substantial harm to your business's competitive position?

If you answered yes, please describe with specificity the substantial harmful effects that would result to your competitive position.

Save Cancel

Number Generic Name CBI Claim? Action

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-15 Add Chemical using SRS (Notice of Activity – NAB) (Scroll 3)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

2. Will disclosure of any information element claimed as CBI likely result in substantial harm to your business's competitive position?

If you answered yes, please describe with specificity the substantial harmful effects that would result to your competitive position if the CBI element is made available to the public.

If, for example, it is not publicly known that the submitter manufactures, imports or processes the reported chemical, describe with specificity the harmful effects that would result if this information were made available to the public. If you are claiming technical contact name or name of authorized official as CBI, describe with specificity the harmful effects that would result if this information were made available to the public.

If you are claiming multiple information elements as CBI, please provide information for EACH element you identified above. If a single substantiation response applies for all information claimed as CBI, you should indicate this in your substantiation response.

Yes

No

3. To the extent your business has disclosed any information to others (both internally and externally), what precautions has your business taken? Please identify the measures or internal controls your business has taken to protect the information claimed as confidential.

1. Non-disclosure agreement required prior to access. Yes No

Section 3.4.2

Save Cancel

Number Generic Name CBI Claim? Action

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-16 Add Chemical using SRS (Notice of Activity – NAB) (Scroll 4)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

3. To the extent your business has disclosed any information to others (both internally and externally), what precautions has your business taken? Please identify the measures or internal controls your business has taken to protect the information claimed as confidential.

1. Non-disclosure agreement required prior to access. Yes No
2. Access is limited to individuals with a need-to-know Yes No
3. Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.). Yes No
4. Other internal control measure(s). If yes, please explain below Yes No

4. Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public?

If you answered yes, please explain why the information should be treated as confidential.

Yes No

Section 3.4.2

Save Cancel

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-17 Add Chemical using SRS (Notice of Activity – NAB) (Scroll 5)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

5. If you assert a claim of confidentiality that is intended to last less than 10 years (see TSCA section 14(e)(1)(B)ii), then please indicate the number of years (between 1-10 years) or specific date/occurrence after which the claim is withdrawn?

Yes No

6. Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance?

If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination.

Yes No

Section 3.4.2

Save Cancel

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-18 Add Chemical using SRS (Notice of Activity – NAB) (Scroll 6)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

B. APPLICABLE ONLY TO CHEMICAL IDENTITY CBI CLAIMS

1. Are you seeking to maintain a specific confidential chemical identity as CBI?
 If you answered yes, please respond to questions below.
 If you answered no, please leave all questions below blank.

Yes
 No

2. Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI?
 If you answered yes, please respond to questions below.
 If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C).

Yes
 No

Section 3.4.2 Save Cancel

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-19 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 7)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

2. Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI?
 If you answered yes, please respond to questions below.
 If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C).

Yes
 No

I understand that I am choosing to supply substantiations at this time for my CBI claims for specific chemical identity.

3. Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States?
 If you answered yes, please explain why the information should be treated as confidential.

Yes
 No

Section 3.4.2 Save Cancel

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-20 Add Chemical using SRS (Notice of Activity – NAA) (Scroll 8)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Add Chemical using SRS

2. Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI?
If you answered yes, please respond to questions below.
If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C).

Yes
 No

I understand that I am choosing not to supply substantiations at this time for my CBI claim for specific chemical identity. Substantiations for a CBI claim for specific chemical identity must be supplied later according to the Review Plan required under TSCA.

3. Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States?
If you answered yes, please explain why the information should be treated as confidential.

Yes
 No

Section 3.4.2 Save Cancel

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-21 Add Chemical using SRS (Notice of Activity – NAB) (Scroll 9)

3.4.1 Add Chemical using SRS (Notice of Activity – NAB) Window Instructional Text

There is no instructional text on the 'Add Chemical using SRS' window.

3.4.2 Add Chemical using SRS (Notice of Activity – NAB) Window Tooltip Text

- **Chemical Identifier:** Displays the chemical identifier of the selected chemical.
- **Chemical Name:** Displays the name of the selected chemical.
- **I am seeking to maintain an existing claim for the confidentiality of the chemical substance identity, as listed on the TSCA Inventory:** Select the radio button to maintain the CBI claim of the identified chemical substance.
- **I am not seeking to maintain an existing claim for the confidential of the chemical substance identity, as listed on the TSCA Inventory:** Select the radio button to indicate that the chemical substance will not maintain the CBI claim.
- **Anticipated Date of Re-entry of Chemical Substance in U.S. Commerce:** Click the date field and select a date on or after 06/22/2016 using the calendar widget to identify the date that the chemical substance will re-enter U.S. commerce.
- **Anticipated Date of Reentry of Chemical Substance in U.S. Commerce - CBI:** Check the 'CBI' checkbox to claim the anticipated date of reentry of the chemical substance into U.S. commerce as confidential.
- **Name of Authorized Official / Mailing Address - CBI:** Check the 'CBI' checkbox to claim the name of the authorized official and mailing address information as confidential.

- **Company Name / Mailing Address - CBI:** Check the ‘CBI’ checkbox to claim the company name and mailing address as confidential.
- **Technical Contact / Telephone Number (in US) - CBI:** Check the ‘CBI’ checkbox to claim the technical contact and telephone number as confidential.
- **Show questions:** Check the checkbox to display the chemical element and non-chemical element substantiation questions.
- **Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)? – Yes:** Select the ‘Yes’ radio button to indicate that any information element that is claimed as CBI is exempt from substantiation.
- **Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)i – No:** Select the ‘No’ radio button to indicate that information elements claimed as CBI are subject to substantiation and respond to the subsequent substantiation questions.
- **Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)i – text box:** Enter text to provide reasoning behind the specific information elements that are not subject to substantiation and applicable exemption(s).
- **Will disclosure of any information element claimed as CBI likely result in substantial harm to your business’s competitive position – Yes:** Select the ‘Yes’ radio button to indicate that disclosure of CBI information would result in substantial harm to your business’s competitive position.
- **Will disclosure of any information element claimed as CBI likely result in substantial harm to your business’s competitive position – No:** Select the ‘No’ radio button to indicate that disclosure of any CBI elements would not result in substantial harm to your business’s competitive position.
- **Will disclosure of any information element claimed as CBI likely result in substantial harm to your business’s competitive position – text box:** Enter information to provide specific examples of the substantial harm that would result to the business’s competitive position if the CBI element is made available to the public.
- **To the extent your business has disclosed any information to others (both internally and externally), what precautions has your business taken? Please identify the measures or internal controls your business has taken to protect the information claimed as confidential.**
 - **Non-disclosure agreement required prior to access – Yes:** Select the ‘Yes’ radio button to indicate that your business has issued non-disclosure agreements required prior to accessing confidential information.
 - **Non-disclosure agreement required prior to access – No:** Select the ‘No’ radio button to indicate that your business has not issued non-disclosure agreements required prior to accessing confidential information.
 - **Access is limited to individuals with a need-to-know – Yes:** Select the ‘Yes’ radio button to indicate that access to information claimed as confidential is limited to individuals with a need-to-know basis.

- **Access is limited to individuals with a need-to-know – No:** Select the ‘No’ radio button to indicate that access to information claimed as confidential is not limited to individuals with a need-to-know basis.
 - **Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.) – Yes:** Select the ‘Yes’ radio button to indicate that information claimed as confidential is physically or electronically secured.
 - **Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.) – No:** Select the ‘No’ radio button to indicate that information claimed as confidential is not physically or electronically secured.
 - **Other internal control measure(s). If yes, please explain below – Yes:** Select the ‘Yes’ radio button to indicate that other internal control measures are utilized to protect confidential information.
 - **Other internal control measure(s). If yes, please explain below – No:** Select the ‘No’ radio button to indicate that no other internal control measures are utilized to protect confidential information.
 - **Other internal control measure(s). If yes, please explain below – text box:** Enter information to explain other internal control measures that are used to protect confidential information.
- **Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public? If you answered yes, please explain why the information should be treated as confidential – Yes:** Select the ‘Yes’ radio button to indicate that information claimed as confidential has appeared in media or other publications that have been made available to the general public.
 - **Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public? If you answered yes, please explain why the information should be treated as confidential – No:** Select the ‘No’ radio button to indicate that information claimed as confidential has not appeared in any media or publications that have been made available to the general public.
 - **Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public? If you answered yes, please explain why the information should be treated as confidential – text box:** Enter reasoning to explain why information claimed as confidential that has been made available to the general public via media or other publications should be treated as confidential.
 - **If you assert a claim of confidentiality that is intended to last less than 10 years (see TSCA section 14(e)(1)(B)ii), then please indicate the number of years (between 1-10**

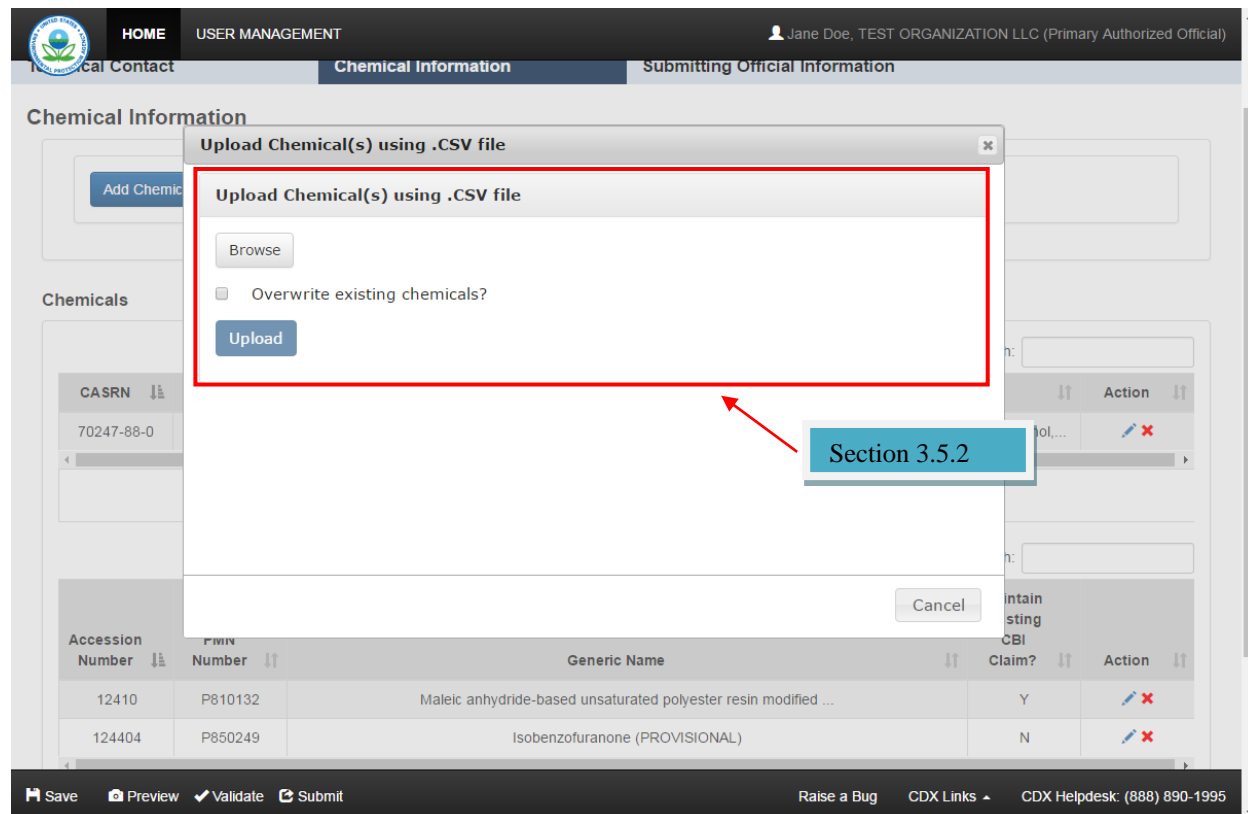
years) or specific date/occurrence after which the claim is withdrawn – text box: Enter the number of years/date/occurrence if you assert a claim of confidentiality that is intended to last less than 10 years after which the confidentiality claim is withdrawn.

- **Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination – Yes:** Select the ‘Yes’ radio button to indicate that EPA/another federal agency/court has made a confidentiality determination regarding information associated with the chemical substance.
- **Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination – No:** Select the ‘No’ radio button to indicate that EPA/another federal agency/court has not made a confidentiality determination regarding information associated with the chemical substance.
- **Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination – text box:** Enter information to explain the outcome of a confidentiality determination associated with the chemical substance.
- **Are you seeking to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank – Yes:** Select the ‘Yes’ radio button to indicate that you are seeking to maintain a specific confidentiality chemical identity as CBI.
- **Are you seeking to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank – No:** Select the ‘No’ radio button to indicate that you are not seeking to maintain a specific confidentiality chemical identity as CBI.
- **Are you seeking to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank – text box:** Enter data to provide information with regards to maintaining a specific confidential chemical identity as CBI.
- **Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C) – Yes:** Select the ‘Yes’ radio button to indicate that you are choosing to supply substantiation information at this time for the CBI claim for a specific chemical identity. ‘I understand that I am choosing to supply substantiations at this time for my CBI claims for specific chemical identity’ displays above the text box.

- **Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C) – No:** Select the ‘No’ radio button to indicate that you are choosing not to supply substantiation information at this time for the CBI claim for a specific chemical identity and will bypass validation for the substantiation fields. The chemical will not be removed from the confidential portion of the TSCA inventory. ‘I understand that I am choosing not to supply substantiations at this time for my CBI claim for specific chemical identity. Substantiations for a CBI claim for specific chemical identity must be supplied later according to the Review Plan required under TSCA.’ displays above the text box when ‘No’ is selected.
- **Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C) – text box:** Enter data to provide additional information regarding substantiation information for a chemical identity.
- **Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States? If you answered yes, please explain why the information should be treated as confidential – Yes:** Select the ‘Yes’ radio button to indicate that the confidential chemical substance is known to have been offered for commercial distribution in the United States.
- **Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States? If you answered yes, please explain why the information should be treated as confidential – No:** Select the ‘No’ radio button to indicate that the confidential chemical substance has not been offered for commercial distribution in the United States.
- **Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States? If you answered yes, please explain why the information should be treated as confidential – text box:** Enter text to provide reasoning with regards to why a confidential chemical substance offered for commercial distribution in the United States should be treated as confidential.
- **Do you wish to claim this substantiation as CBI? By marking yes, you are certifying to the truth of the below statements – Yes:** Select the ‘Yes’ radio button to indicate that the information entered is accurate and truthful.
- **Do you wish to claim this substantiation as CBI? By marking yes, you are certifying to the truth of the below statements – No:** Select the ‘No’ radio button to indicate that you are not marking the substantiation information as CBI and that your statements may not be accurate.

3.5 Upload Chemical(s) using .CSV file Window

Exhibit 3-22 Upload Chemical(s) using .CSV file



3.5.1 Upload Chemical(s) using .CSV file Window Instructional Text

There is no instructional text on the 'Upload Chemical(s) using .CSV file' window.

3.5.2 Upload Chemical(s) using .CSV file Window Tooltip Text

- **Browse:** Click the 'Browse' button to generate the 'Open' window to search for the .csv file to upload.
- **Overwrite existing chemicals:** Check the 'Overwrite existing chemicals' checkbox to overwrite any previously entered chemicals. Leave the checkbox unchecked to append chemicals onto any previously entered chemicals.
- **Upload:** Click the 'Upload' button to upload the contents of the .csv file into the 'Chemicals' table.
- **Cancel:** Click the 'Cancel' button to close the window without uploading the chemical .csv file.

3.6 CBI Substantiation Screen

Exhibit 3-23 CBI Substantiation (Scroll 1)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

Step 1 Step 2 Step 3 Step 4

Technical Contact Chemical Information **CBI Substantiation** Submitting Official Information

Cbi Substantiation

Search:

Chemical Identifier	Chemical Name	Action	Validation
164331	Emulsion polymer (PROVISIONAL)		
230003	Aromatic substituted diurea (P...		
232689	Polymeric MDI based polyuretha...		

No Chemical Currently selected

Section 3.6.2

Previous Continue

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-24 CBI Substantiation (Scroll 2)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

TSCA Section 8(b) NAA-20170607-09:52:46

Step 1 Step 2 Step 3 Step 4

Technical Contact Chemical Information **CBI Substantiation** Submitting Official Information

Cbi Substantiation

Search:

Chemical Identifier	Chemical Name	Action	Validation
164331	Emulsion polymer (PROVISIONAL)		
230003	Aromatic substituted diurea (P...		
232689	Polymeric MDI based polyuretha...		

Chemical Identifier: 164331

Chemical Name: Emulsion polymer (PROVISIONAL)

Copy CBI Substantiation from:

A. REQUIRED FOR ANY IDENTIFIED CBI CLAIM

1. Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)?

If you answered yes, you must identify the specific information element(s), specify the applicable exemption(s), and answer no further questions with respect to that/those information element(s). For any information element that is not exempt, please respond to all of the questions below.

If the Agency disagrees with this assertion, you may be asked to provide additional information to support your claim.

Yes

No

test

Section 3.6.2

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-25 CBI Substantiation (Scroll 3)

HOME USER MANAGEMENT
Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

TSCA Section 8(b) ▶ NAA-20170607-09:52:46

Step 1 Step 2 **Step 3** Step 4

Technical Contact Chemical Information **CBI Substantiation** Submitting Official Information

Cbi Substantiation

Search:

#	Chemical Name	Action	Validation
11	Emulsion polymer (PROVISIONAL)	✖	✔
13	Aromatic substituted diurea (P...	✖	ⓘ
19	Polymeric MDI based polyuretha...	✖	✔

Chemical Identifier: 164331

Attention

The substantiation answers provided for 232689 will overwrite the current contents of the substantiation fields

as CBI is exempt from substantiation


information element(s), specify the applicable exemption(s), and answer no further questions with respect to that/those information element(s). For any information element that is not exempt, please respond to all of the questions below.

If the Agency disagrees with this assertion, you may be asked to provide additional information to support your claim.

Response is required
 Yes
 No

[Raise a Bug](#)
[CDX Links](#)
[CDX Helpdesk: \(888\) 890-1995](#)

Exhibit 3-26 CBI Substantiation (Scroll 4)

HOME USER MANAGEMENTJane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

2. Will disclosure of any information element claimed as CBI likely result in substantial harm to your business's competitive position?

If you answered yes, please describe with specificity the substantial harmful effects that would result to your competitive position if the CBI element is made available to the public.

If, for example, it is not publicly known that the submitter manufactures, imports or processes the reported chemical, describe with specificity the harmful effects that would result if this information were made available to the public. If you are claiming technical contact name or name of authorized official as CBI, describe with specificity the harmful effects that would result if this information were made available to the public.

If you are claiming multiple information elements as CBI, please provide information for EACH element you identified above. If a single substantiation response applies for all information claimed as CBI, you should indicate this in your substantiation response.


Yes
 No

3. To the extent your business has disclosed any information to others (both internally and externally), what precautions has your business taken? Please identify the measures or internal controls your business has taken to protect the information claimed as confidential.

1. Non-disclosure agreement required Yes No
2. Access is limited to individuals with a need-to-know Yes No
3. Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, secured, protected, etc.) Yes No

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-27 CBI Substantiation (Scroll 5)

 **HOME** USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

3. To the extent your business has disclosed any information to others (both internally and externally), what precautions has your business taken? Please identify the measures or internal controls your business has taken to protect the information claimed as confidential.

- 1. Non-disclosure agreement required prior to access. Yes No
- 2. Access is limited to individuals with a need-to-know Yes No
- 3. Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.). Yes No
- 4. Other internal control measure(s). If yes, please explain below Yes No

4. Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public?


If you answered yes, please explain why the information should be treated as confidential.

Yes

No


5. If you assert a claim of confidentiality that is intended to last less than 10 years (see TSCA

Section 3.6.2



Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-28 CBI Substantiation (Scroll 6)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

test

5. If you assert a claim of confidentiality that is intended to last less than 10 years (see TSCA section 14(e)(1)(B)(ii)), then please indicate the number of years (between 1-10 years) or specific date/occurrence after which the claim is withdrawn?

test

6. Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance?

If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination.

Yes

No

test

B. APPLICABLE ONLY TO CHEMICAL IDENTITY CBI CLAIMS

1. Are you seeking to maintain a specific confidential chemical identity as CBI?

If you answered yes, please respond to questions below.


If you answered no, please leave all questions below blank.

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Section 3.6.2



Exhibit 3-29 CBI Substantiation (Scroll 7)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

B. APPLICABLE ONLY TO CHEMICAL IDENTITY CBI CLAIMS

1. Are you seeking to maintain a specific confidential chemical identity as CBI?
If you answered yes, please respond to questions below.
If you answered no, please leave all questions below blank.

Yes
 No

2. Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI?
If you answered yes, please respond to questions below.
If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C).

Yes
 No

I understand that I am choosing to supply substantiations at this time for my CBI claims for specific chemical identity.

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Section 3.6.2



Exhibit 3-30 CBI Substantiation (Scroll 8)

test

3. Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States?

If you answered yes, please explain why the information should be treated as confidential.

Yes

No

test

C. CERTIFICATION

1. Do you wish to claim this substantiation as CBI?

By marking yes, you are certifying to the truth of the below statements.

Yes

No

Save Cancel

Previous Continue

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Section 3.6.2

3.6.1 CBI Substantiation Screen Instructional Text

There is no instructional text on the 'CBI Substantiation' screen.

3.6.2 CBI Substantiation Screen Tooltip Text

- **Chemical Identifier:** Displays chemical identifiers of the chemical substances.
- **Chemical Name:** Displays the chemical name of the chemical substances.
- **Action:** Click the 'Edit' icon to generate and display the CBI substantiation questions that were answered. Click the 'Delete' icon to delete the specific chemical substance.
- **Validation:** Displays a checkmark to indicate that the CBI substantiation questions have been answered. Displays an exclamation point to indicate that CBI substantiation answers have not been provided for the specific chemical substance.
- **Chemical Identifier:** Displays the chemical identifier of the selected chemical substance that is being edited.
- **Chemical Name:** Displays the chemical name of the selected chemical substance for which the substantiation answers are being edited.
- **Copy CBI Substantiation from:** Select a chemical identifier from the drop-down menu to copy the substantiation answers provided for another chemical into the current chemical substance fields. Select a blank value to clear the text entered into the substantiation fields.

- **Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)i?** – **Yes:** Select the ‘Yes’ radio button to indicate that any information element that is claimed as CBI is exempt from substantiation.
- **Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)i** – **No:** Select the ‘No’ radio button to indicate that information elements claimed as CBI are subject to substantiation and respond to the subsequent substantiation questions.
- **Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)i** – **text box:** Enter text to provide reasoning behind the specific information elements that are not subject to substantiation and applicable exemption(s).
- **Will disclosure of any information element claimed as CBI likely result in substantial harm to your business’s competitive position** – **Yes:** Select the ‘Yes’ radio button to indicate that disclosure of CBI information would result in substantial harm to your business’s competitive position.
- **Will disclosure of any information element claimed as CBI likely result in substantial harm to your business’s competitive position** – **No:** Select the ‘No’ radio button to indicate that disclosure of any CBI elements would not result in substantial harm to your business’s competitive position.
- **Will disclosure of any information element claimed as CBI likely result in substantial harm to your business’s competitive position** – **text box:** Enter information to provide specific examples of the substantial harm that would result to the business’s competitive position if the CBI element is made available to the public.
- **To the extent your business has disclosed any information to others (both internally and externally), what precautions has your business taken? Please identify the measures or internal controls your business has taken to protect the information claimed as confidential.**
 - **Non-disclosure agreement required prior to access** – **Yes:** Select the ‘Yes’ radio button to indicate that your business has issued non-disclosure agreements required prior to accessing confidential information.
 - **Non-disclosure agreement required prior to access** – **No:** Select the ‘No’ radio button to indicate that your business has not issued non-disclosure agreements required prior to accessing confidential information.
 - **Access is limited to individuals with a need-to-know** – **Yes:** Select the ‘Yes’ radio button to indicate that access to information claimed as confidential is limited to individuals with a need-to-know basis.
 - **Access is limited to individuals with a need-to-know** – **No:** Select the ‘No’ radio button to indicate that access to information claimed as confidential is not limited to individuals with a need-to-know basis.
 - **Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.)** – **Yes:** Select the

‘Yes’ radio button to indicate that information claimed as confidential is physically or electronically secured.

- **Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.) – No:** Select the ‘No’ radio button to indicate that information claimed as confidential is not physically or electronically secured.
 - **Other internal control measure(s). If yes, please explain below – Yes:** Select the ‘Yes’ radio button to indicate that other internal control measures are utilized to protect confidential information.
 - **Other internal control measure(s). If yes, please explain below – No:** Select the ‘No’ radio button to indicate that no other internal control measures are utilized to protect confidential information.
 - **Other internal control measure(s). If yes, please explain below – text box:** Enter information to explain other internal control measures that are used to protect confidential information.
- **Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public? If you answered yes, please explain why the information should be treated as confidential – Yes:** Select the ‘Yes’ radio button to indicate that information claimed as confidential has appeared in media or other publications that have been made available to the general public.
 - **Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public? If you answered yes, please explain why the information should be treated as confidential – No:** Select the ‘No’ radio button to indicate that information claimed as confidential has not appeared in any media or publications that have been made available to the general public.
 - **Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public? If you answered yes, please explain why the information should be treated as confidential – text box:** Enter reasoning to explain why information claimed as confidential that has been made available to the general public via media or other publications should be treated as confidential.
 - **If you assert a claim of confidentiality that is intended to last less than 10 years (see TSCA section 14(e)(1)(B)ii), then please indicate the number of years (between 1-10 years) or specific date/occurrence after which the claim is withdrawn – text box:** Enter the number of years/date/occurrence if you assert a claim of confidentiality that is intended to last less than 10 years after which the confidentiality claim is withdrawn.
 - **Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If you answered yes, please**

explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination – Yes: Select the ‘Yes’ radio button to indicate that EPA/another federal agency/court has made a confidentiality determination regarding information associated with the chemical substance.

- **Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination – No:** Select the ‘No’ radio button to indicate that EPA/another federal agency/court has not made a confidentiality determination regarding information associated with the chemical substance.
- **Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination – text box:** Enter information to explain the outcome of a confidentiality determination associated with the chemical substance.
- **Are you seeking to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank – Yes:** Select the ‘Yes’ radio button to indicate that you are seeking to maintain a specific confidentiality chemical identity as CBI.
- **Are you seeking to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank – No:** Select the ‘No’ radio button to indicate that you are not seeking to maintain a specific confidentiality chemical identity as CBI.
- **Are you seeking to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank – text box:** Enter data to provide information with regards to maintaining a specific confidential chemical identity as CBI.
- **Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C) – Yes:** Select the ‘Yes’ radio button to indicate that you are choosing to supply substantiation information at this time for the CBI claim for a specific chemical identity. ‘I understand that I am choosing to supply substantiations at this time for my CBI claims for specific chemical identity’ displays above the text box.
- **Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C) – No:** Select the ‘No’ radio button to indicate that you are choosing not to supply substantiation information at this time for the CBI claim

for a specific chemical identity and will bypass validation for the substantiation fields. The chemical will not be removed from the confidential portion of the TSCA inventory. 'I understand that I am choosing not to supply substantiations at this time for my CBI claim for specific chemical identity. Substantiations for a CBI claim for specific chemical identity must be supplied later according to the Review Plan required under TSCA.' displays above the text box when 'No' is selected.

- **Are you providing a substantiation at this time to maintain a specific confidential chemical identity as CBI? If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank. You must substantiate by the deadline established in a forthcoming Review Plan, to be promulgated at a later date in accordance with TSCA section 8(b)(4)(C) – text box:** Enter data to provide additional information regarding substantiation information for a chemical identity.
- **Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States? If you answered yes, please explain why the information should be treated as confidential – Yes:** Select the 'Yes' radio button to indicate that the confidential chemical substance is known to have been offered for commercial distribution in the United States.
- **Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States? If you answered yes, please explain why the information should be treated as confidential – No:** Select the 'No' radio button to indicate that the confidential chemical substance has not been offered for commercial distribution in the United States.
- **Is the confidential chemical substance publicly known to have ever been offered for commercial distribution in the United States? If you answered yes, please explain why the information should be treated as confidential – text box:** Enter text to provide reasoning with regards to why a confidential chemical substance offered for commercial distribution in the United States should be treated as confidential.
- **Do you wish to claim this substantiation as CBI? By marking yes, you are certifying to the truth of the below statements – Yes:** Select the 'Yes' radio button to indicate that the information entered is accurate and truthful.
- **Do you wish to claim this substantiation as CBI? By marking yes, you are certifying to the truth of the below statements – No:** Select the 'No' radio button to indicate that you are not marking the substantiation information as CBI and that your statements may not be accurate.
- **Save:** Click the 'Save' button to save the entered information into the CBI substantiation answers.
- **Cancel:** Click the 'Cancel' button to close the displayed substantiation fields.

3.7 Submitting Official Information Screen

Exhibit 3-31 Submitting Official Information (Scroll 1)

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

TSCA Section 8(b) > NAA-20170524-12:56:31

Step 1 Step 2 Step 3

Technical Contact Chemical Information **Submitting Official**

Submitting Official Information

The information below has been pre-populated from CDX registration. If the information listed is incorrect please make the appropriate edits to your user information in CDX registration. Check the associated checkbox to confirm your acknowledgement of the legally responsible certification statement and activate the "Validate" button.

First Name: Jane
Middle Initial: E
Last Name: Doe
Company Name: TEST ORGANIZATION LLC
Phone Number: 5555555555
Email: Jane.Doe@gmail.com
Mailing Address 1: 1025 LEESBURG PIKE
City: FALLS CHURCH
State: VA
Postal Code: 22033

Section 3.7.1

Save Preview Validate Submit Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 3-32 Submitting Official Information (Scroll 2)

HOME USER MANAGEMENT
Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

The information below has been pre-populated from CDX registration. If the information listed is incorrect please make the appropriate edits to your user information in CDX registration.
Check the associated checkbox to confirm your acknowledgement of the legally responsible certification statement and activate the 'Validate' button.

First Name:	Jane
Middle Initial:	E
Last Name:	Doe
Company Name:	John.Doe@test.com .C
Phone Number:	5555555555
Email:	Jane.Doe@gmail.com
Mailing Address 1:	1025 LEESBURG PIKE
City:	FALLS CHURCH
State:	VA
Postal Code:	22033
Country:	US

This confirmation is required to proceed with the submission process
Please confirm that you are the legally responsible party from the submitting company.

Previous
Start Submission Process

Section 3.7.2

←

Save Preview Validate Submit
Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

3.7.1 Submitting Official Information Screen Instructional Text

The information below has been pre-populated from CDX registration. If the information listed is incorrect please make the appropriate edits to your user information in CDX registration.

Check the associated checkbox to confirm your acknowledgement of the legally responsible certification statement and activate the 'Validate' button.

This confirmation is required to proceed with the submission process

Please confirm that you are the legally responsible party from the submitting company.

3.7.2 Submitting Official Information Screen Tooltip Text

- **First Name:** Displays the first name of the submitting official.
- **Middle Initial:** Displays the middle initial of the submitting official.
- **Last Name:** Displays the last name of the submitting official.
- **Company Name:** Displays the company name of the submitting official.
- **Phone Number:** Displays the phone number of the submitting official.
- **Email:** Displays the email address of the submitting official.

-
- **Mailing Address 1:** Displays the mailing address of the submitting official.
 - **City:** Displays the city of the mailing address of the submitting official.
 - **State:** Displays the state of the mailing address of the submitting official.
 - **Postal Code:** Displays the zip code of the mailing address of the submitting official.
 - **Country:** Displays the country of the mailing address of the submitting official.
 - **Legal Verification Checkbox:** Check the checkbox to confirm that you are the legally responsible party and enable the 'Start Submission Process' button.
 - **Previous:** Click the 'Previous' button to save the submitting official's information and navigate to the 'Chemical Information' screen.
 - **Start Submission Process:** Click the 'Start Submission Process' button to save the submitting official's information and navigate to the 'TSCA Certification' screen to begin the submission process.

4 Submit to EPA via CDX

This section illustrates examples of instructional text to be displayed on each screen located within the Section 8(b) application during the submission process. This section also includes tooltip text to be displayed for specific fields.

4.1 TSCA Certification Screen

Exhibit 4-1 TSCA Certification

TSCA Certification

I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate.

I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for protection for any confidential information made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that the person submitting the claim has:

- i. taken reasonable measures to protect the confidentiality of the information;
- ii. determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law;
- iii. a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of the person; and
- iv. a reasonable basis to believe that the information is not readily discoverable through reverse engineering.

Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.

Section 4.1.1

Cancel Continue

Section 4.1.2

Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

4.1.1 TSC Certification Screen Instructional Text

I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate.

I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for protection for any confidential information made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that the person submitting the claim has:

- (i) taken reasonable measures to protect the confidentiality of the information;
- (ii) determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law;
- (iii) a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of the person; and
- (iv) a reasonable basis to believe that the information is not readily discoverable through reverse engineering.

Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.

4.1.2 TSCA Certification Screen Tooltip Text

- **Cancel:** Click the ‘Cancel’ button to navigate back to the ‘Technical Contact Information’ page within the Section 8(b) Notice of Activity –NAA or NAB form.
- **Continue:** Click the ‘Continue’ button to navigate to the ‘8B Certification’ page.

4.2 8B Certification Screen

Exhibit 4-2 8B Certification

TSCA Section 8(b) ▶ NAB-20170524-13:04:39

Step 1 TSCA Certification | Step 2 **8B Certification** | Step 3 Validation | Step 4 Review & Submit

8B Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision and the information contained therein, to the best of my knowledge is, true, accurate, and complete. I am aware there are significant penalties for submitting incomplete, false and/or misleading information, including the possibility of fine and imprisonment for knowing violations.

Cancel Continue

Section 4.2.1

Section 4.2.2

Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

4.2.1 8B Certification Screen Instructional Text

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision and the information contained therein, to the best of my knowledge is, true, accurate, and complete. I am aware there are significant penalties for submitting incomplete, false and/or misleading information, including the possibility of fine and imprisonment for knowing violations.

4.2.2 8B Certification Screen Tooltip Text

- **Cancel:** Click the ‘Cancel’ button to navigate back to the ‘Technical Contact Information’ page within the Section 8(b) Notice of Activity –NAA or NAB form.
- **Continue:** Click the ‘Continue’ button to navigate to the ‘8B Validation’ page.

4.3 8B Validation Screen

Exhibit 4-3 8B Validation (No Errors)

The screenshot displays the 'Validation' step of the TSCA Section 8(b) process. The navigation bar shows four steps: Step 1 (TSCA Certification), Step 2 (8B Certification), Step 3 (Validation), and Step 4 (Review & Submit). The 'Validation' step is currently active. A message box states: 'No Validation Errors! Congratulations! Your 8(b) form has passed the validation check. Please click the 'Review & Submit' button to continue the submission process.' Below the message are two buttons: 'Cancel' and 'Review & Submit'. Red arrows point from callout boxes labeled 'Section 4.3.1' and 'Section 4.3.2' to the message box and the 'Review & Submit' button, respectively.

4.3.1 8B Validation Screen Instructional Text

No Validation Errors

Congratulations! Your 8(b) form has passed the validation check.
Please click the 'Review & Submit' button to continue the submission process.

4.3.2 8B Validation Screen Tooltip Text

- **Cancel:** Click the 'Cancel' button to navigate back to the 'Technical Contact Information' page within the Section 8(b) Notice of Activity –NAA or NAB form.
- **Review & Submit:** Click the 'Review & Submit' button to navigate to the 'PDF Generation' page.

4.4 8B Validation Screen (Errors)

Exhibit 4-4 8B Validation (Errors)

The screenshot shows the CDX interface for TSCA Section 8(b) certification. The user is Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official). The process is at Step 3: Validation. A red box highlights a message: "Validation Errors Found! Sorry, your 8(b) form contains validation errors and cannot be submitted now. Please correct all the validation errors shown in the pop-up window and try submitting again." A blue box labeled "Section 4.4.1" points to this message. A pop-up window titled "TSCA Section 8b" lists the following errors:

- CBI Substantiation
 - CBI Substantiation is missing for chemical, Accession#: 230003
- Submitter Official Information
 - Legal Verification is required.

At the bottom of the page, there are links for "Raise a Bug", "CDX Links", and "CDX Helpdesk: (888) 890-1995".

4.4.1 8B Validation Screen Instructional Text

Validation Errors Found!

Sorry, your 8(b) form contains validation errors and cannot be submitted now.
Please correct all the validation errors shown in the pop-up window and try submitting again.

4.4.2 8B Validation Screen Tooltip Text

- **Cancel:** Click the 'Cancel' button to navigate back to the 'Technical Contact Information' page within the Section 8(b) Notice of Activity –NAA or NAB form and correct the errors.

4.5 PDF Generation Screen

Exhibit 4-5 PDF Generation

PDF Generation

Click the "Regular PDF" or "Sanitized PDF" button to view a PDF of the Section 8(b) Notice of Activity form. If you make no CBI claims, the two versions will be the same. Please do NOT send a copy of the PDF to the EPA. Click the "Sign, Encrypt, and Submit" button to complete the submission process.

Cancel Regular PDF Sanitized PDF Sign, Encrypt and Submit

Section 4.5.1

Section 4.5.2

4.5.1 PDF Generation Screen Instructional Text

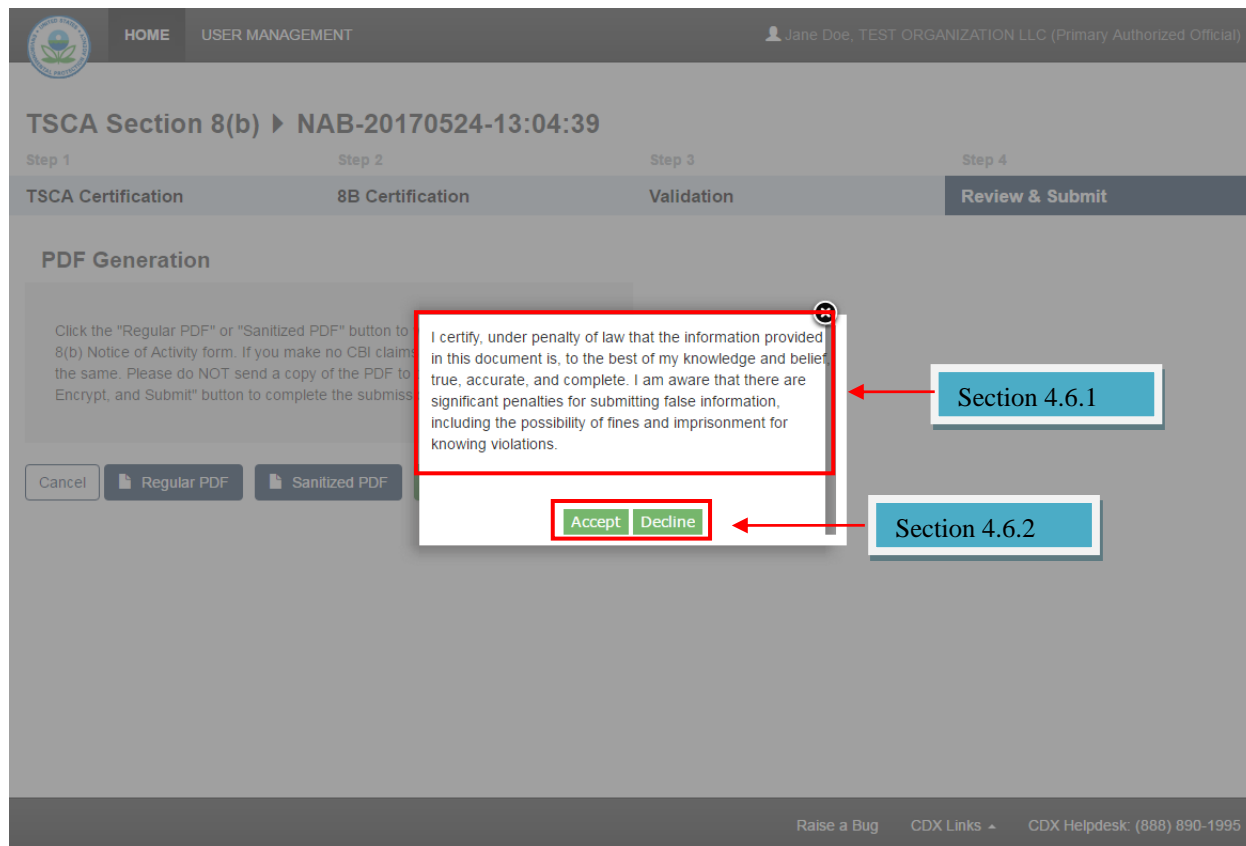
Click the "Regular PDF" or "Sanitized PDF" button to view a PDF of the Section 8(b) Notice of Activity form. If you make no CBI claims, the two versions will be the same. Please do NOT send a copy of the PDF to the EPA. Click the "Sign, Encrypt, and Submit" button to complete the submission process.

4.5.2 PDF Generation Screen Tooltip Text

- **Cancel:** Click the 'Cancel' button to navigate to the 'Technical Contact Information' page within the Section 8(b) Notice of Activity –NAA or NAB form.
- **Regular PDF:** Click the 'Regular PDF' button to generate a regular PDF of the Notice of Activity form – NAA or NAB form.
- **Sanitized PDF:** Click the 'Sanitized PDF' button to generate a sanitized PDF of the Notice of Activity form – NAA or NAB form.
- **Sign, Encrypt and Submit:** Click the 'Sign, Encrypt and Submit' button to generate the CROMERR certification window.

4.6 CROMERR Certification Window

Exhibit 4-6 CROMERR Certification



4.6.1 CROMERR Certification Window Instructional Text

I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

4.6.2 CROMERR Certification Window Tooltip Text

- **Accept:** Click the 'Accept' button to agree to and accept the CROMERR certification statement and proceed with the submission process.
- **Decline:** Click the 'Decline' button to stop the submission process and remain on the 'PDF Generation' page.

4.7 eSignature Widget

Exhibit 4-7 eSignature Widget: Authentication

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

TSCA Section 8(b) NAB-20170524-13:04:39

Step 1 Step 2 Step 3 Step 4

TSCA Certification 8B Certification Validation Review & Submit

PDF Generation

Click the "Reg 8(b) Notice of the same. Plea Encrypt, and S

Cancel R

eSignature Widget

1. Authentication

Log into CDX

User:
JANEDOEOPPT

Password:

Login

Raise a Bug CDX Links CDX Helpdesk (888) 890-1995

Exhibit 4-8 eSignature Widget: Verification

HOME USER MANAGEMENT Jane Doe, TEST ORGANIZATION LLC (Primary Authorized Official)

TSCA Section 8(b) ▶ NAB-20170524-13:04:39

Step 1 Step 2 Step 3 Step 4

TSCA Certification 8B Certification Validation **Review & Submit**

PDF Generation

Click the "Reg 8(b) Notice of the same. Plea Encrypt, and S

Cancel R

eSignature Widget

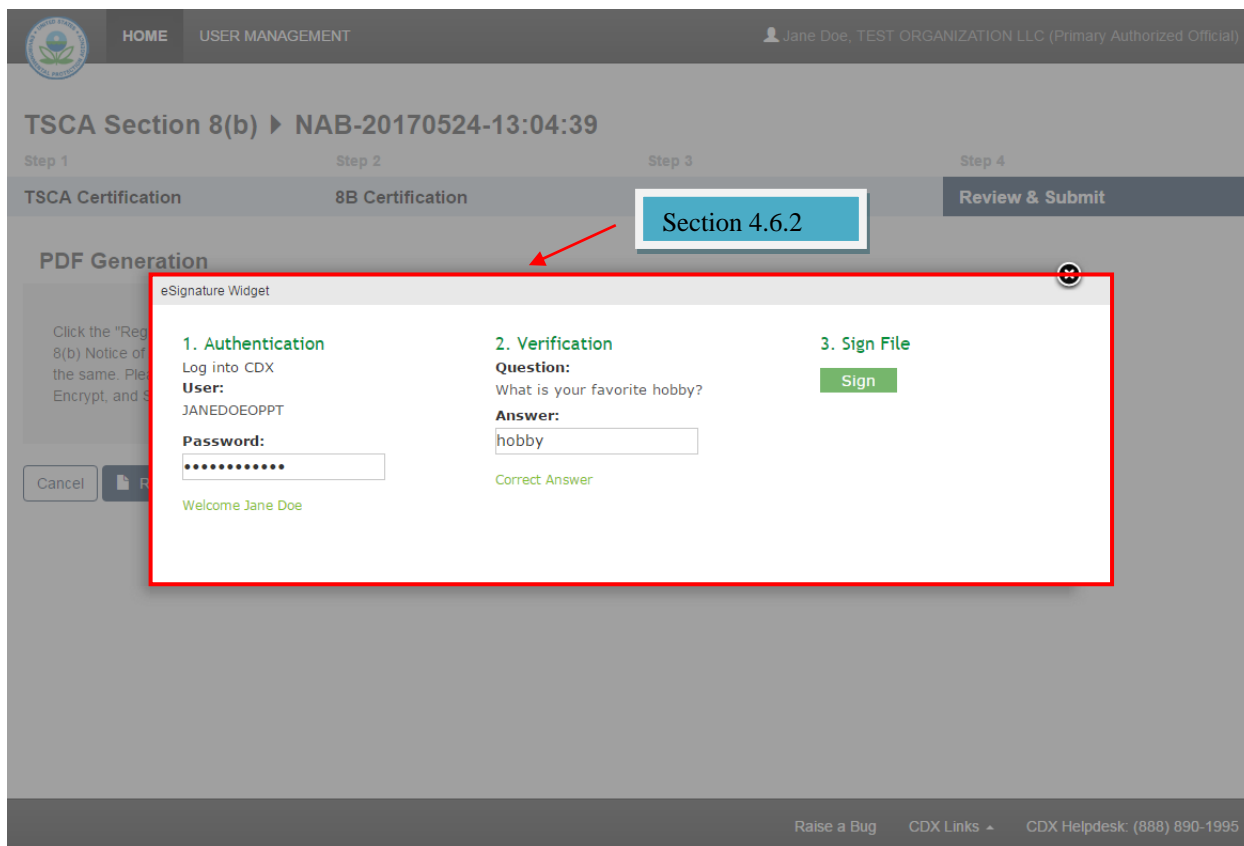
1. Authentication
Log into CDX
User:
JANEDOEOPPT
Password:
••••••••
Welcome Jane Doe

2. Verification
Question:
What is your favorite hobby?
Answer:

Answer

Raise a Bug CDX Links ◀ CDX Helpdesk: (888) 890-1995

Exhibit 4-9 eSignature Widget: Sign File



4.7.1 eSignature Widget Instructional Text

1. Log into CDX
2. Verification
3. Sign File

4.7.2 eSignature Widget Tooltip Text

- **Login:** Click the 'Login' button after providing the CDX password.
- **Answer:** Click the 'Answer' button after providing the response to the 20-5-1 question.
- **Sign:** Click the 'Sign' button to finish the eSignature widget process and navigate to the TSCA Section 8(b) 'Home' page.