



**Formaldehyde Standards for  
Composite Wood Products Act: TSCA  
Title VI User Guide – Accreditation  
Body Authorized Official**

Environmental Protection Agency

Office of Pollution Prevention and Toxics

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## Table of Contents

Table of Contents.....	i
List of Exhibits.....	iii
1 Introduction .....	1
2 System Requirements .....	2
2.1 Supported Browsers .....	2
2.2 Screen Resolution .....	2
3 Accreditation Body Authorized Official Functions.....	3
3.1 Log into TSCA Title VI Application .....	4
3.2 Home Screen Navigation.....	4
3.3 User Management .....	6
3.4 Applications and Notifications .....	7
3.5 Annual Reports.....	10
3.6 Create Passphrase.....	12
3.7 Enter Passphrase .....	14
3.8 Navigation Tree .....	14
3.9 Action Bar.....	16
3.10 Choose Laboratory .....	18
3.11 Confidential Business Information (CBI) .....	23
4 Accreditation Body Application for Recognition Agreement .....	24
4.1 Create an Accreditation Body Application for Recognition Agreement.....	24
4.1.1 Organization Information.....	24
4.1.2 Point of Contact .....	29
4.1.3 US Agent Information.....	31
4.1.4 Recognition Agreement Approval – Laboratory Accreditation Body .....	33
4.1.5 Recognition Agreement Approval – Product Accreditation Body .....	38
4.2 Accreditation Body for Recognition Agreement Form Amendment.....	43
5 Failure to Comply Notification Forms.....	45
5.1 Create Failure to Comply Notification – Third-Party Certifier Form.....	45
5.1.1 Failure to Comply Notification – Third-Party Certifier .....	45
5.2 Create Failure to Comply Notification – Laboratory Form .....	48
5.2.1 Failure to Comply Notification – Laboratory .....	48
5.3 Failure to Comply Form Amendment .....	51
6 Annual Report Forms .....	52



---

6.1	Create Product AB Annual Report Form.....	52
6.1.1	Product AB Annual Report.....	52
6.2	Create Laboratory AB Annual Report Form .....	54
6.2.1	Laboratory AB Annual Report .....	54
6.3	Annual Report Amendment.....	56
7	Preview .....	57
8	Validate .....	60
9	CBI Substantiation.....	61
9.1	Instructions for Substantiating Confidential Business Information (CBI) Claims .....	61
10	Submit to EPA via CDX.....	65
10.1	Submission Process: Validate .....	65
10.2	Submission Process: PDF Generation Screen .....	66
10.3	Cross-Media Electronic Reporting Regulation (CROMERR) Submission Screen.....	67
11	Download Copy of Record.....	68
12	EPA Communications .....	69
13	Create an Amendment .....	74
14	Resources .....	76
	Appendix A .....	77



## List of Exhibits

Exhibit 3-1 TSCA Title VI User Roles Matrix .....	4
Exhibit 3-2 TSCA Title VI Home Screen.....	5
Exhibit 3-3 User Management Screen.....	7
Exhibit 3-4 Applications and Notifications Screen.....	9
Exhibit 3-5 Annual Reports Screen .....	12
Exhibit 3-6 Create Passphrase Screen .....	13
Exhibit 3-7 Enter Passphrase Screen.....	14
Exhibit 3-8 Navigation Prompt Pop-Up Window .....	15
Exhibit 3-9 Accreditation Body Application for Recognition Agreement Navigation Tree .....	16
Exhibit 3-10 Failure to Comply Notification Navigation Tree .....	16
Exhibit 3-11 Annual Report Navigation Tree .....	16
Exhibit 3-12 Action Bar – Save.....	17
Exhibit 3-13 Action Bar – Preview .....	17
Exhibit 3-14 Action Bar – Validate .....	17
Exhibit 3-15 Action Bar – Submit.....	18
Exhibit 3-16 Action Bar – CDX Links .....	18
Exhibit 3-17 Failure to Comply Notification: Laboratory Search Screen.....	20
Exhibit 3-18 Failure to Comply Notification: Laboratory Search Results Screen .....	21
Exhibit 3-19 Failure to Comply Notification: Add New Laboratory Screen.....	22
Exhibit 3-20 Confidential Business Information Pop-Up Window .....	23
Exhibit 4-1 Organization Information Screen (Scroll 1).....	27
Exhibit 4-2 Organization Information Screen (Scroll 2).....	28
Exhibit 4-3 Organization Information Screen (Scroll 3).....	29
Exhibit 4-4 Point of Contact Screen (Scroll 1) .....	30
Exhibit 4-5 Point of Contact Screen (Scroll 2) .....	31
Exhibit 4-6 US Agent Information Screen (Scroll 1).....	32
Exhibit 4-7 US Agent Information Screen (Scroll 2).....	33
Exhibit 4-8 Recognition Agreement Approval-Laboratory Accreditation Body (Scroll 1).....	34
Exhibit 4-9 Recognition Agreement Approval-Laboratory Accreditation Body (Scroll 2).....	35
Exhibit 4-10 Recognition Agreement Approval-Laboratory Accreditation Body (Scroll 3).....	36
Exhibit 4-11 Recognition Agreement Approval-Laboratory Accreditation Body (Scroll 4).....	37
Exhibit 4-12 Recognition Agreement Approval-Product Accreditation Body (Scroll 1) .....	39
Exhibit 4-13 Recognition Agreement Approval-Product Accreditation Body (Scroll 2) .....	40



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Exhibit 4-14 Recognition Agreement Approval-Product Accreditation Body (Scroll 3) .....	41
Exhibit 4-15 Recognition Agreement Approval-Product Accreditation Body (Scroll 4) .....	42
Exhibit 4-16 Accreditation Body for Recognition Agreement Amendment Screen .....	44
Exhibit 5-1 Failure to Comply Notification – Third-Party Certifier Screen .....	47
Exhibit 5-2 Failure to Comply Notification – Laboratory Screen .....	50
Exhibit 5-3 Failure to Comply Notification Amendment Screen.....	51
Exhibit 6-1 Product AB Annual Report Screen .....	53
Exhibit 6-2 Laboratory AB Annual Report Screen.....	55
Exhibit 6-3 Annual Report Amendment Screen .....	56
Exhibit 7-1 Preview AB Form PDF .....	57
Exhibit 7-2 Preview Failure to Comply Notification Form PDF .....	58
Exhibit 7-3 Preview Annual Report Form PDF.....	59
Exhibit 8-1 TSCA Title VI Validation Pop-Up Window.....	60
Exhibit 9-1 Instructions for Substantiating Confidential Business Information (CBI) Claims Screen (Scroll 1).....	62
Exhibit 9-2 Instructions for Substantiating CBI Claims Screen (Scroll 2) (Substantiation Opt-Out Example).....	63
Exhibit 9-3 Instructions for Substantiating CBI Claims Screen (Scroll 3) (Sanitized Substantiation Upload Example).....	64
Exhibit 10-1 Submission Process: Validate Screen .....	65
Exhibit 10-2 Submission Process: PDF Generation Screen .....	66
Exhibit 10-3 Cross-Media Electronic Reporting Regulation (CROMERR) Submission Screen ..	67
Exhibit 11-1 Copy of Record Screen .....	68
Exhibit 12-1 New EPA Communication Email Notification .....	69
Exhibit 12-2 New EPA Communication CDX Inbox Notification.....	70
Exhibit 12-3 Applications and Notifications Screen.....	71
Exhibit 12-4 Copy of Record Screen .....	72
Exhibit 13-1 Applications and Notifications Screen – Amendment.....	74
Exhibit 13-2 Unlock Prompt Message .....	74
Exhibit 14-1 Resources Screen.....	76

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## 1 Introduction

This document presents the user guide for the Office of Pollution Prevention and Toxics (OPPT) Formaldehyde Standards for Composite Wood Products application and online reporting submission process, enacted as Title VI of the Toxic Substances Control Act (TSCA). This document is the user guide for the Accreditation Body (AB) Authorized Official user of the TSCA Title VI application.

The TSCA Title VI application is the electronic, web-based tool provided by the United States Environmental Protection Agency (EPA) for the submission of data pursuant to TSCA Title VI. As an AB Authorized Official, you can create, modify, and/or submit a TSCA Title VI form. You can also delete TSCA Title VI forms, create amendments, and download a Copy of Record.

For questions concerning the TSCA Title VI software requirements, please contact the Central Data Exchange (CDX) Help Desk at [helpdesk@epacdx.net](mailto:helpdesk@epacdx.net) or call 1-888-890-1995 between the hours of 8:00 am – 6:00 pm Eastern Standard Time (EST). For questions concerning the TSCA Title VI regulatory reporting requirements, please contact the TSCA Hotline at [TSCA-Hotline@epa.gov](mailto:TSCA-Hotline@epa.gov) or call 202-554-1404 between the hours of 8:30 am – 5:00 pm EST. For general questions concerning ABs or Third-Party Certifiers (TPC), please contact the TSCA Title VI program office at [TSCATitleVI-AB@epa.gov](mailto:TSCATitleVI-AB@epa.gov).

## 2 System Requirements

To use the TSCA Title VI application to submit a TSCA Title VI form, the following is required:

- An e-mail account
- JavaScript enabled web browser
- Internet access
- Adobe Acrobat Reader 5.0 or higher
- CDX username and password

### 2.1 Supported Browsers

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- Vendor supported versions of Internet Explorer (IE) or Edge
  - Go to the following link to download:  
<https://support.microsoft.com/en-us/help/17621/internet-explorer-downloads>
- Vendor supported versions of Mozilla Firefox
  - Go to the following link to download:  
<https://www.mozilla.org/en-US/firefox/new/>
- Vendor supported versions of Safari
  - Go to the following link to download:  
<https://support.apple.com/downloads/>
- Vendor supported versions of Google Chrome
  - Go to the following link to download:  
<http://www.google.com/chrome>

### 2.2 Screen Resolution

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

### 3 Accreditation Body Authorized Official Functions

This section describes how to:

- Access the application
- Navigate the TSCA Title VI ‘Home’ screen
- Assign Supports to complete a form
- Start and complete the TSCA Title VI forms – Accreditation Body Application for EPA Recognition, Failure to Comply Notification – Third-Party Certifier, Failure to Comply Notification – Laboratory, Annual Report – Product AB, and Annual Report – Laboratory AB.
- Download a Copy of Record (CoR)
- Create an amendment

The AB Authorized Official is responsible for the submission of original main forms, including AB Application for EPA Recognition, Failure to Comply Notification – TPC, Failure to Comply Notification – Laboratory, Annual Report – Product AB, or Annual Report – Laboratory AB forms. As an AB Authorized Official, you can create a new form, submit amendments, and delete forms. You can also assign Supports (or other authorized individuals) to edit and complete a form on your behalf.



You can save the form at any point during the data entry process. The save functionality allows you to return to that same form at any point in the future. In addition, you can view a .pdf version of the form at any point, which shows all the data entered in the form up to the point of generation.

Exhibit 3-1 shows a table of the capabilities of user roles within the TSCA Title VI application:

**Exhibit 3-1 TSCA Title VI User Roles Matrix**

<b>Legend</b>	<b>Accreditation Body Authorized Official</b>		<b>Accreditation Body Support</b>		<b>Third-Party Certifier Authorized Official</b>		<b>Third-Party Certifier Support</b>	
X=Can Perform Function								
<b>AB Application, Failure to Comply Notifications, Annual Reports</b>								
Create all original main forms	X							
Submit original main forms	X							
Submit amendments (by editing the main forms)	X							
Unlock all main forms	X							
Edit unlocked main forms	X		X					
Delete forms	X							
Assign Supports	X							
Receive EPA Communications	X		X					
<b>TPC Application, Failed Quarterly Tests, Quality Control Limit Exceedances, Reduced Testing and Exemption Notifications, Annual Reports</b>								
Create forms					X			
Submit forms					X			
Submit amendments					X			
Unlock forms					X			
Edit unlocked forms					X		X	
Delete forms					X			
Assign Supports					X			
Receive EPA Communications					X		X	

### 3.1 Log into TSCA Title VI Application

After you create an account in CDX, click the ‘Accreditation Body (AB) Authorized Official’ link for the Chemical Safety and Pesticide Programs (CSPP) data flow to navigate to the TSCA Title VI ‘Home’ screen.

### 3.2 Home Screen Navigation

You can access the TSCA Title VI ‘Home’ screen by clicking the ‘Accreditation Body (AB) Authorized Official’ link for the CSPP data flow in CDX.

The TSCA Title VI ‘Home’ screen is the first screen within the TSCA Title VI application. It provides you with links to access the ‘Applications and Notifications,’ ‘Annual Reports,’ ‘User Management,’ and ‘Resources’ screens. To navigate to any of these screens, click the corresponding screen link on the TSCA Title VI ‘Home’ screen, or click the link located within the application header.

There is a ten (10) minute logout timer for this application; the application will automatically log you out after 10 minutes of inactivity and navigate you back to the CDX login screen.

- **Applications and Notifications:** Click the ‘Applications and Notifications’ tab or link to navigate to the ‘Applications and Notifications’ screen. You can create, modify, or delete a

TSCA Title VI form using the ‘Applications and Notifications’ screen. For additional details about the ‘Applications and Notifications’ screen, please refer to **Section 3.4**.

- **Annual Reports:** Click the ‘Annual Reports’ tab or link to navigate to the ‘Annual Reports’ screen. You can create, modify, or delete a Product AB or Laboratory AB Annual Report form using the ‘Annual Reports’ screen. The ‘Annual Reports’ forms are only available if the organization of an AB Authorized Official, has an approved AB Application for EPA Recognition. For additional details about the ‘Annual Reports’ screen, please refer to **Section 3.5**.
- **User Management:** Click the ‘User Management’ tab or link to navigate to the ‘User Management’ screen. You can manage the access rights of Supports per form ID using the ‘User Management’ screen. For additional details about the ‘User Management’ screen, please refer to **Section 3.3**.
- **Resources:** Click the ‘Resources’ tab or link to navigate to the ‘Resources’ screen. You can find the TSCA Title VI user guide, as well as useful links for guidance documents, on the ‘Resources’ screen. For additional details about the ‘Resources’ screen, please refer to **Section 13**.

Exhibit 3-2 shows a screen capture of the TSCA Title VI ‘Home’ screen:

**Exhibit 3-2 TSCA Title VI Home Screen**

**Home**

**Applications and Notifications**  
Create, modify, or delete a TSCA Title VI application agreement, annual reports, and/or compliance notifications by clicking the 'Applications and Notifications' link and selecting your submission type from the 'Select Form Type' drop-down list. For more detailed guidance please refer to the appropriate user guide, as provided in the resources section below.

**Annual Reports**  
Create, modify, or delete a Product and/or Laboratory Accreditation Body (AB) Annual Report by clicking the Annual Reports link. An Annual Report can only be created if an organization has an approved AB Application and Recognition Agreement with EPA.

**User Management**  
Manage the access rights of Supports for each TSCA Title VI form. For every Support, the Authorized Official may grant the ability to edit (but not unlock, create, delete, or submit) the form. For more detailed guidance please refer to the appropriate user guide, as provided in the resources section below.

**Resources**  
See links to helpful guidance documents and websites for TSCA Title VI.

**Authorized Official**  
An Authorized Official has the ability to create, delete, modify, unlock, and submit TSCA Title VI forms electronically to EPA. The Authorized Official also has the ability to assign Supports to individual forms.

**Paperwork Reduction Act Notice**  
Responses to this collection of information must comply with EPA's procedural requirements in order to be eligible for EPA consideration (40 CFR 702). This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-0185; EPA ICR No. 201611-2070-003). The annual public reporting and recordkeeping burden for this collection of information is estimated to be 1,481,525 hours.  
Burden is defined in 5 CFR 1320.3(b). An agency may not conduct or sponsor, and a person is not required to, respond to a collection of information unless it displays a currently valid OMB control number. You may send comments regarding the EPA's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Please include the OMB Control No. in any correspondence. Send only comments to this address.

**Authority**  
The Government Paperwork Elimination Act (GPEA) (44 U.S.C. 3504) provides that, when practicable, Federal organizations use electronic forms, electronic filings, and electronic signatures to conduct official business with the public. EPA's Cross-Media Electronic Reporting Regulation (CROMERR) (40 CFR part 3) (Ref. 2), provides that any requirement in title 40 of the CFR to submit a report directly to EPA can be satisfied with an electronic submission that meets certain conditions once the Agency published a document in the Federal Register announcing that EPA is prepared to receive certain documents in electronic form. For more information about CROMERR, go to <http://www.epa.gov/cromerr>.

**Navigation:** Click the ‘User Management’ link or tab to access the ‘User Management’ screen to assign AB Supports (if applicable).

### 3.3 User Management

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You can access the ‘User Management’ screen by clicking the ‘User Management’ link on the TSCA Title VI ‘Home’ screen or by clicking the ‘User Management’ tab from the application header.

On the ‘User Management’ screen, you have the ability to assign/un-assign one or more Supports to have access to modify any of the TSCA Title VI forms you have created.

**Form ID:** The form ID is a system-generated ID that helps differentiate between form types. A form ID will not be available in this drop-down menu until a form has been created. Select a form ID from the drop-down menu to begin assigning Supports. Once a form ID has been selected, the ‘Assign Supports’ group box will update to display only the Supports who have identified you as their AB Authorized Official during CDX registration.

**Form Information:** This field set displays information pertaining to the form you selected from the ‘Form ID’ drop-down menu.

- **Unique ID:** Displays the ID of the form that a user selects from the ‘Form ID’ drop-down menu.

**Assign Supports:** This box shows all the Supports you can assign to complete a TSCA Title VI form for the form ID selected. To move support persons from the ‘Unassigned’ group box to the ‘Assigned’ group box, highlight an individual or multiple Support(s) and click the ‘Add >>’ button.

- **Unassigned:** This box/field contains the registered Support(s) associated with the Authorized Official who, potentially could 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. To highlight multiple consecutive support persons, hold down the <Shift> key on your keyboard while clicking the first and last Support in the list.
- **Assigned:** This box/field contains the registered Support(s) given permission, by the Authorized Official, to access and edit the selected form. This group box shows all support persons assigned to complete the TSCA Title VI form for a single form ID. To move 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. To highlight multiple consecutive support persons, hold down the <Shift> key on your keyboard while clicking the first and last Support in the list.
- **Add >>:** Click the ‘Add >>’ button to move Supports from the ‘Unassigned’ box to the ‘Assigned’ box.
- **<< Remove:** Click the ‘<< Remove’ button to move Supports from the ‘Assigned’ box to the ‘Unassigned’ box.

When you have finished assigning Supports, click the ‘Save’ button to save the changes.

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

### Exhibit 3-3 User Management Screen

Navigation: Click the ‘Applications and Notifications’ tab located within the application header to navigate to the ‘Applications and Notifications’ screen.

### 3.4 Applications and Notifications

You can access the ‘Applications and Notifications’ screen by clicking the ‘Applications and Notifications’ link from the TSCA Title VI ‘Home’ screen, or by clicking the ‘Applications and Notifications’ tab located within the application header.

Each TSCA Title VI form is assigned one unique ID, which is a system-generated ID that helps differentiate between form types. The ‘Unique ID,’ ‘Form Type,’ ‘Status,’ ‘Modify Date,’ and ‘Submission Date’ columns in the table of the ‘TSCA Title VI Applications and Notifications’ screen can be sorted by clicking the individual column headers.

**Start New Form:** To create a new TSCA Title VI form, select a form type from the ‘Select Form Type’ drop-down menu and click the ‘Start New Form’ button. Before having the option of selecting alternate forms, the user must first have an approved AB Application. Following this submission, the user will have the option to select and submit the following forms: Failure to Comply Notification – Third-Party Certifier, or Failure to Comply Notification – TPC Laboratory. Both the Failure to Comply Notification – Third-Party Certifier and Failure to Comply Notification – TPC Laboratory forms will be available in the drop-down menu when an AB Authorized Official’s organization has an approved AB Application for EPA Recognition.

**Edit an ‘In Progress’ Form:** To modify an existing TSCA Title VI form, click the ‘Unique ID’ link for a form with a status of ‘In Progress.’ It is possible for more than one user to modify a form simultaneously; the user that clicks the ‘Save’ button first will have their changes saved.

**Amend a submitted Form:** To edit an already submitted TSCA Title VI form (i.e., to create an amendment), you must first unlock the particular submission by clicking the ‘Lock’ icon (🔒)

under the ‘Actions’ column. All further changes will be submitted as an amendment. Refer to **Section 13** for further instructions on creating an amendment.

The ‘Applications and Notifications’ screen displays the following columns of information:

- **Unique ID:** Displays the unique ID generated by the TSCA Title VI application. Click the unique ID to access and edit the form.
- **Form Type:** Displays the form type of each TSCA Title VI form submission. This column can contain the following values: ‘Accreditation Body Application for Recognition Agreement,’ or ‘Accreditation Body Failure to Comply Notification.’
- **Status:** Displays the status of the TSCA Title VI form. The values will display as either ‘In Progress,’ ‘Processing,’ ‘Pending,’ ‘Submitted,’ ‘Approved,’ ‘Rejected,’ ‘Suspended,’ ‘Revoked,’ ‘Renewed,’ or ‘Withdrawn.’
- **Modify Date:** Displays the date the submission was last modified.
- **Submission Date:** Displays the date when the user completed and sent the submission to EPA via CDX. This date populates only after a user submits the form.
- **Actions:**
  - **Delete:** Displays a ‘Delete’ icon (✖) for all forms with a status of ‘In Progress.’ Click the ‘Delete’ icon to delete a form.
  - **Lock/Unlock:** Displays a ‘Lock’ icon (🔒) for all forms that have been submitted and are not ‘In Progress.’ Only an AB Authorized Official can unlock a form by clicking the ‘Lock’ icon (🔒) to unlock the form. The form will remain unlocked and display a flag icon (🚩) next to the status of the form in the ‘Status’ column until the amendment is submitted by the AB Authorized Official.
  - **Copy of Record:** Click the ‘Copy of Record’ icon (📄) to navigate to the ‘Cross-Media Electronic Reporting Regulation (CROMERR) Login’ screen, and then to the ‘Copy of Record’ screen. The ‘Copy of Record’ icon (📄) displays only after the form has been completed. Refer to **Section 11** for further instructions on downloading the copy of record. If you have just submitted via CDX, the ‘Copy of Record’ icon (📄) may take 15–20 minutes to display. In addition, you must refresh the ‘Applications and Notifications’ screen for the ‘Copy of Record’ icon (📄) to display.
  - **EPA Communication:** Displays a ‘Closed Envelope’ icon (✉) for a submission that contains a new EPA communication and an ‘Open Envelope’ icon (📧) for a submission that contains a previously downloaded EPA communication. To access a communication, click either the ‘Closed Envelope,’ ‘Open Envelope,’ or ‘Copy of Record’ icon. To ensure EPA communications are not improperly viewed, access to EPA communications is restricted to users who may access the copy of record for a submission. Additionally, EPA captures and stores CDX user and timestamp data each time an EPA communication is accessed.
- **Items per Page:** Select a value (‘25,’ ‘50,’ ‘75,’ or ‘100’) from this drop-down menu to specify the number of forms to display on a single page.

- **Export Options:** Displays ‘CSV,’ ‘Excel,’ ‘XML,’ and ‘PDF’ links for you to export the ‘Applications and Notifications’ screen in one of the specified formats as an Excel spreadsheet, Comma-Separated Values (CSV) file, Extensible Markup Language (XML) file, or portable document format (PDF). The export options section will not display until a form is created.
- **Select Form Type:** Select the form type that you would like to create from the drop-down menu. This drop-down menu contains the following values: ‘Accreditation Body Application for Recognition Agreement,’ ‘Failure to Comply Notification – Third-Party Certifier,’ or ‘Failure to Comply Notification – Laboratory.’ ‘Failure to Comply Notification – Third-Party Certifier,’ and ‘Failure to Comply Notification – Laboratory’ forms will be available in the drop-down menu when an AB Authorized Official’s organization has an approved AB Application for EPA Recognition.
- **Start New Form:** Click this button to start a new form after selecting a form type.

Exhibit 3-4 shows a screen capture of the ‘Applications and Notifications’ screen:

**Exhibit 3-4 Applications and Notifications Screen**

**Applications and Notifications**

- If submitting a form for the first time in the TSCA Title VI application, select a form from the 'Select Form Type' drop-down menu and click the 'Start New Form' button.
- To edit an 'In Progress' form, click the Unique ID link in the Unique ID column in the table below.
- To access and edit a form previously submitted through CDX, unlock the form by clicking the lock icon. All additional changes made to an application and/or notification form will be submitted as an amendment. An amendment must be submitted to capture information regarding a change in accreditation status including the suspension, reduction or withdrawal of accreditation.
- To download a copy of record for a submitted form, click the green arrow icon.
- To delete any form that has not yet been submitted, click the delete icon.
- All columns may be sorted by clicking the column header.
- Once a form has been completed, click the "Submit" button to begin the submission process.

4 entries found. Items Per Page: 25

Unique ID	Form Type	Status	Modify Date	Submission Date	Actions
AB-APP-3799	Accreditation Body Application for Recognition Agreement	Approved	01/22/2018	01/22/2018	
AB-FC-3901	Accreditation Body Failure to Comply Notification	Submitted	01/22/2018	01/22/2018	
AB-FC-3914	Accreditation Body Failure to Comply Notification	Submitted	01/22/2018	01/22/2018	
AB-APP-3779	Accreditation Body Application for Recognition Agreement	In Progress	01/19/2018		

Export options: [CSV](#) | [Excel](#) | [XML](#) | [PDF](#)

Select Form Type  
 Failure to Comply Notification - Third-Party Certifier

**Start New Form**

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

**Navigation:** Select a form type from the ‘Select Form Type’ drop-down menu and click the ‘Start New Form’ button to create a TSCA Title VI form.

### 3.5 Annual Reports

You can access the ‘Annual Reports’ screen by clicking the ‘Annual Reports’ link from the TSCA Title VI ‘Home’ screen, or by clicking the ‘Annual Reports’ tab located within the application header. The ‘Annual Reports’ forms will not be available until the AB Authorized Official’s organization has an approved AB Application for EPA Recognition.

Each annual report is assigned one unique ID, which is a system-generated ID that helps differentiate between different form types. The ‘Unique ID,’ ‘Form Type,’ ‘Reporting Year,’ ‘Status,’ ‘Modify Date,’ and ‘Submission Date’ columns in the table of the ‘Annual Reports’ screen can be sorted by clicking the individual column headers.

**Start New Annual Report:** To create a new TSCA Title VI annual report, select one of the following options from the ‘Select Annual Report Type’ drop-down menu and click the ‘Start New Annual Report’ button: ‘Annual Report – Product AB,’ or ‘Annual Report – Laboratory AB.’

**Edit an ‘In Progress’ Form:** To modify an existing TSCA Title VI annual report, click the ‘Unique ID’ link for a form with a status of ‘In Progress.’ It is possible for more than one user to modify a form simultaneously; the user that clicks the ‘Save’ button first will have their changes saved.

**Amend a submitted form:** To edit an already submitted TSCA Title VI annual report (i.e., to create an amendment), you must first unlock the particular submission by clicking the ‘Lock’ icon (🔒) under the ‘Actions’ column. All further changes that are made will be submitted as an amendment. Refer to **Section 13** for further instructions on creating an amendment.

The ‘Annual Reports’ screen displays the following columns of information:

- **Unique ID:** Displays the unique ID generated by the TSCA Title VI application. Click the unique ID to access and edit the annual report.
- **Form Type:** Displays ‘Accreditation Body Annual Report.’
- **Status:** Displays the status of the TSCA Title VI form. The values will display as either ‘In Progress,’ ‘Processing,’ or ‘Submitted.’
- **Modify Date:** Displays the date the submission was last modified.
- **Submission Date:** Displays the date when the user completed and sent the submission to EPA via CDX. This date populates only after a user submits the form.
- **Actions:**
  - **Delete:** Displays a ‘Delete’ icon (✖) for all forms with a status of ‘In Progress.’ Click the ‘Delete’ icon to delete a form.
  - **Lock/Unlock:** Displays a ‘Lock’ icon (🔒) for all forms that have been submitted and are not ‘In Progress.’ Only an AB Authorized Official can unlock a form by clicking the ‘Lock’ icon (🔒) to unlock the form. The form will remain unlocked and display a flag icon

(  ) next to the status of the form in the ‘Status’ column until the form is resubmitted by the AB Authorized Official.







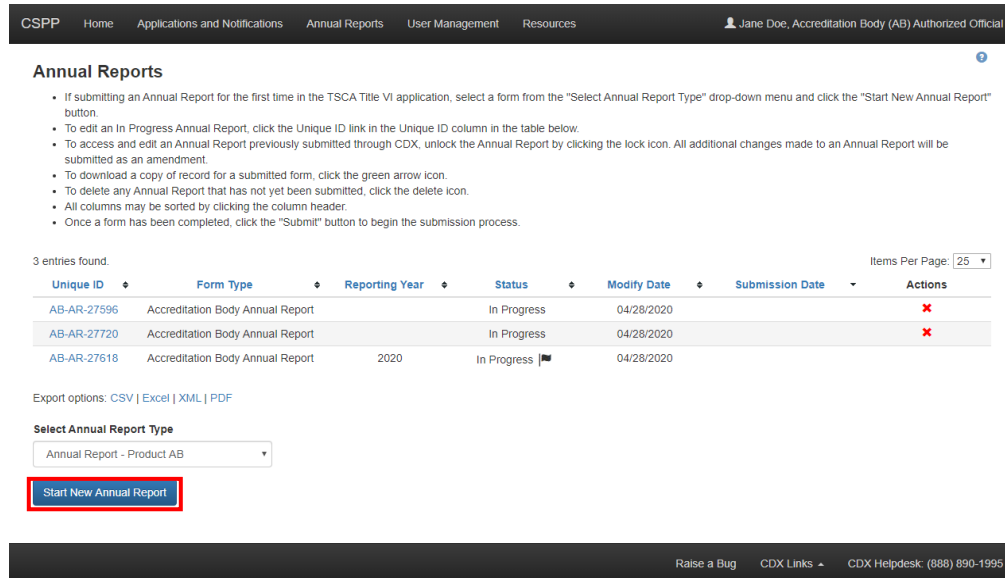
- **Copy of Record:** Click the ‘Copy of Record’ icon (  ) to navigate to the ‘Cross-Media Electronic Reporting Regulation (CROMERR) Login’ screen, and then to the ‘Copy of Record’ screen. The ‘Copy of Record’ icon (  ) displays only after the form has been completed. Refer to **Section 11** for further instructions on downloading the copy of record. If you have just submitted via CDX, the ‘Copy of Record’ icon (  ) may take 15–20 minutes to display. In addition, you must refresh the ‘Annual Reports’ screen for the ‘Copy of Record’ icon (  ) to display.
- **EPA Communication:** Displays a ‘Closed Envelope’ icon (  ) for a submission that contains a new EPA communication and an ‘Open Envelope’ icon (  ) for a submission that contains a previously downloaded EPA communication. To access a communication, click either the ‘Closed Envelope,’ ‘Open Envelope,’ or ‘Copy of Record’ icon. To ensure EPA communications are not improperly viewed, access to EPA communications is restricted to users who may access the copy of record for a submission. Additionally, EPA captures and stores CDX user and timestamp data each time an EPA communication is accessed.
- **Items per Page:** Select a value (‘25,’ ‘50,’ ‘75,’ or ‘100’) from this drop-down menu to specify the number of forms to display on a single page.
- **Export Options:** Displays ‘CSV,’ ‘Excel,’ ‘XML,’ and ‘PDF’ links for you to export the ‘Annual Reports’ screen in one of the specified formats as an Excel spreadsheet, CSV file, XML file, or PDF. The export options section will not display until a form is created.
- **Select Annual Report Type:** Select the form type that you would like to create from the drop-down menu. This drop-down menu contains the following values: ‘Annual Report – Product AB,’ or ‘Annual Report – Laboratory AB.’
- **Start New Annual Report:** Click this button to start a new annual report after selecting an annual report type.



Exhibit 3-5 shows a screen capture of the ‘Annual Reports’ screen for an AB Authorized Official:

**Exhibit 3-5 Annual Reports Screen**



**Navigation:** Select a form type from the ‘Select Annual Report Type’ drop-down menu and click the ‘Start New Annual Report’ button to create an annual report.

### 3.6 Create Passphrase

To start a new TSCA Title VI form, select a form type from the ‘Select Form Type’ drop-down menu, and click the ‘Start New Form’ button on the ‘Applications and Notifications’ screen to navigate to the ‘Create Passphrase’ screen, which allows you to create a passphrase and associate that passphrase with a newly created form.

The application uses the passphrase as an encryption key to protect the contents of the form. You are responsible for remembering the passphrase and distributing it to the appropriate individuals. AB Authorized Officials should only share the passphrase to registered users of the Title VI application with a need to support the AB forms.

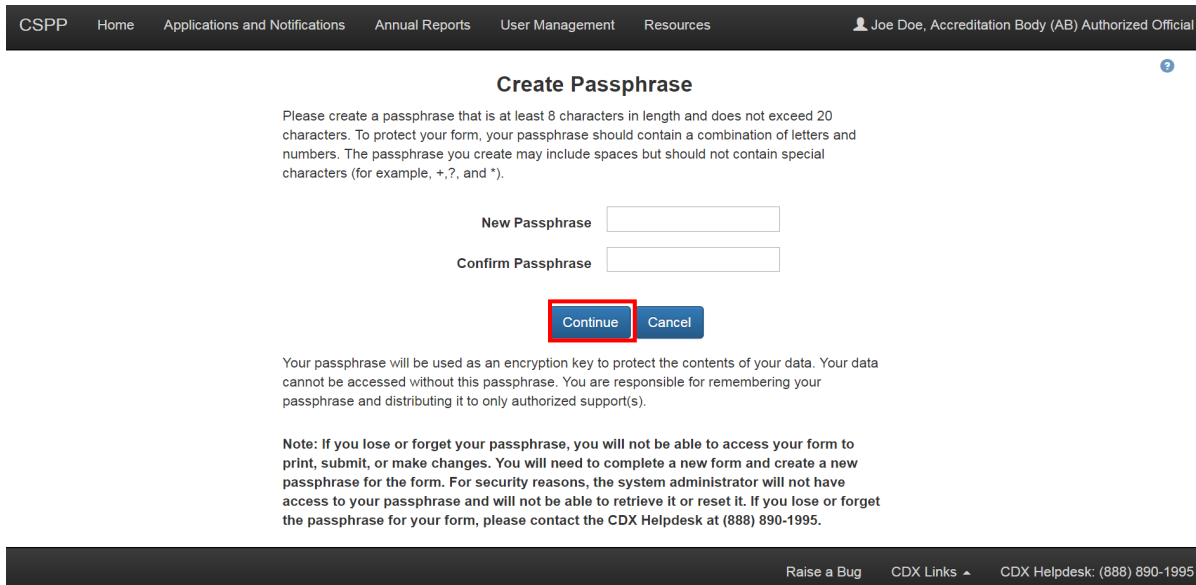
If you forget the passphrase, you will not have access to the form and will not be able to view, print, submit, or make changes. If you lose or forget the passphrase, you must create a new form and passphrase. For security reasons, the system administrator does not have access to the passphrase and will not be able to retrieve it or reset it to a new one.

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

You will be responsible for remembering the passphrase and distributing it to only authorized Supports for an individual form. If you forget the passphrase, you will not be able to access the TSCA Title VI form to print, submit, or make changes.

Exhibit 3-6 shows a screen capture of the ‘Create Passphrase’ screen for an AB Authorized Official:

### Exhibit 3-6 Create Passphrase Screen



**Create Passphrase**

Please create a passphrase that is at least 8 characters in length and does not exceed 20 characters. To protect your form, your passphrase should contain a combination of letters and numbers. The passphrase you create may include spaces but should not contain special characters (for example, +, ?, and \*).

New Passphrase

Confirm Passphrase

[Continue](#) [Cancel](#)

Your passphrase will be used as an encryption key to protect the contents of your data. Your data cannot be accessed without this passphrase. You are responsible for remembering your passphrase and distributing it to only authorized support(s).

**Note:** If you lose or forget your passphrase, you will not be able to access your form to print, submit, or make changes. You will need to complete a new 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 it or reset it. If you lose or forget the passphrase for your form, please contact the CDX Helpdesk at (888) 890-1995.

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

**Navigation:** Create a passphrase and click the ‘Continue’ button to navigate to the ‘Organization Information’ screen for an Accreditation Body Application for Recognition Agreement form. Click the ‘Continue’ button to navigate to the ‘Failure to Comply’ screen for a Failure to Comply Notification – Third-Party Certifier or Failure to Comply Notification – Laboratory form. Click the ‘Continue’ button to navigate to the ‘Product AB Annual Report’ or ‘Laboratory AB Annual Report’ screen for an Annual Report – Product AB or Annual Report – Laboratory AB form.

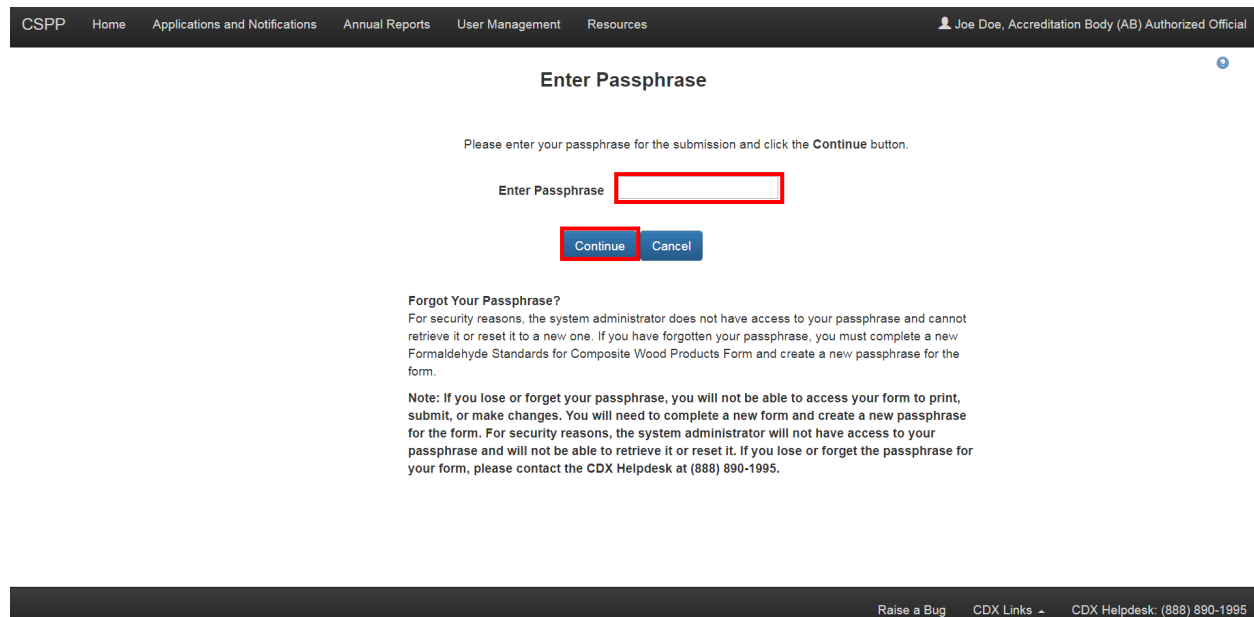
### 3.7 Enter Passphrase

To edit a form, click the ‘Unique ID’ link for a TSCA Title VI form with a status of ‘In Progress’ on the ‘Applications and Notifications’ or ‘Annual Reports’ screen. The ‘Enter Passphrase’ screen requires you to enter the passphrase that is associated with the form.

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

Exhibit 3-7 shows a screen capture of the ‘Enter Passphrase’ screen:

**Exhibit 3-7 Enter Passphrase Screen**



**Navigation:** Enter the passphrase that you originally created and associated with the form and click the ‘Continue’ button to navigate to the ‘Organization Information’ screen for an Accreditation Body Application for Recognition Agreement form. Click the ‘Continue’ button to navigate to the ‘Failure to Comply’ screen for a Failure to Comply Notification – Third-Party Certifier or Failure to Comply Notification – Laboratory form. Click the ‘Continue’ button to navigate to the ‘Product AB Annual Report’ or ‘Laboratory AB Annual Report’ screen for an Annual Report – Product AB or Annual Report – Laboratory AB form.

### 3.8 Navigation Tree

The navigation tree is located on the left-hand side of each screen when completing a Title VI form. It allows you to navigate between the various screens within the application and the different sections of the form. You can perform the following functions using the navigation tree:

- **Open and close the navigation tree:** A navigation arrow that opens and closes the navigation tree is located to the right of the navigation tree to provide more visual form space. Click the left-facing arrow (◀) on the open navigation tree to close the navigation tree and increase the space of the form content. Likewise, click the right-facing arrow (▶) on the closed navigation tree to open the navigation tree.





- **Collapse and expand folders:** Each section of the form falls under a collapsible folder within the navigation tree, which allows you to save space or easily view items in the navigation tree. When a folder is expanded, you can click the ‘Folder’ icon (  ) or the folder title link to collapse that section of the navigation tree. When a folder is collapsed, you can click the ‘Folder’ icon (  ) or the folder title link to expand that section of the navigation tree.
- **Navigate between screens:** You can use the navigation tree to navigate between the various screens within the application and the different sections of the form. A ‘Form’ icon (  ) denotes each section of a form. Click the ‘Form’ icon (  ) or a section title link to navigate between screens. You are required to save all information entered on a particular screen before navigating to the next screen or all entered information will be lost. A prompt will appear after you click a link in the navigation tree indicating, ‘Are you sure you want to leave the current page? Any unsaved changes will be lost.’ Click the ‘OK’ button to navigate to the requested screen without saving any of the data in the previous screen. Click the ‘Cancel’ button to close the prompt and remain on the current screen.

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

**Exhibit 3-8 Navigation Prompt Pop-Up Window**

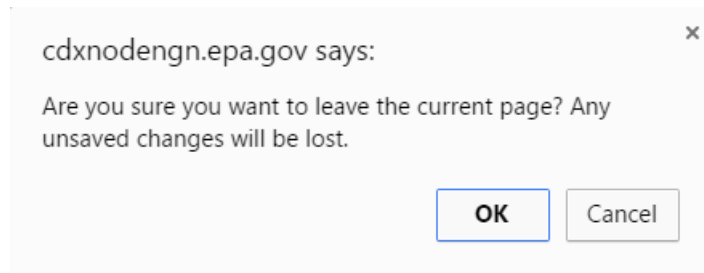


Exhibit 3-9 Accreditation Body Application for Recognition Agreement Navigation Tree

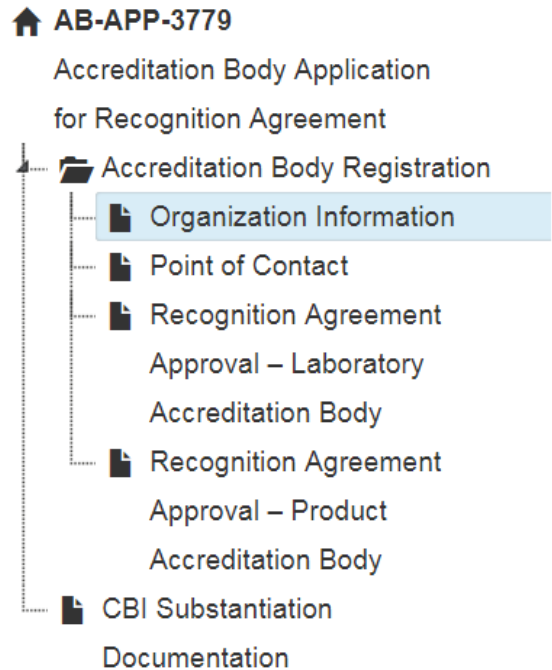


Exhibit 3-10 shows a screen capture of the Failure to Comply Notification navigation tree:

**Exhibit 3-10 Failure to Comply Notification Navigation Tree**

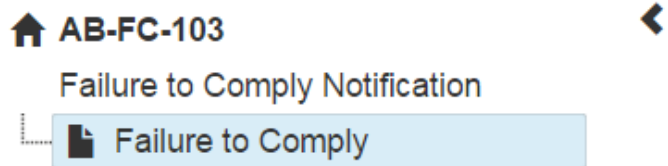
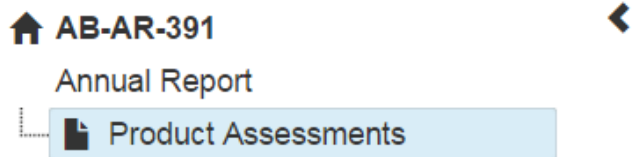


Exhibit 3-11 shows a screen capture of the Annual Report navigation tree:



**Exhibit 3-11 Annual Report Navigation Tree**



### 3.9 Action Bar

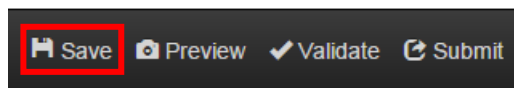
The action bar is located at the bottom of each screen when completing a Title VI form. You can perform the following functions using the action bar:




- **Save:** Click the ‘Save’ icon (📁) at any stage of completing a TSCA Title VI form to save the form. To generate and access links to other pages of the form within the navigation tree, you must click the ‘Save’ icon (📁) within the action bar. After you click the ‘Save’ icon

() , a prompt will appear on the screen indicating that all data entered in the form has been saved successfully. The save function does not validate any entered data. On screens that display an expandable/collapsible field set, you must click the ‘Save’ button displayed within the expandable/collapsible field set to save the information entered before being able to click the ‘Save’ icon () located within the action bar or use the ‘Previous,’ ‘Next,’ or ‘Submit’ buttons. For any TSCA Title VI form that contains more than one page, clicking the ‘Previous’ and ‘Next’ buttons on a form will save the data entered within a form before navigating to the previous or next page.

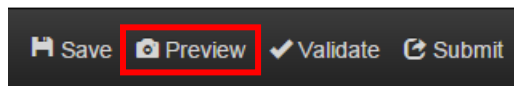
The following exhibits, Exhibit 3-12, Exhibit 3-13, Exhibit 3-14, and Exhibit 3-15, show screen captures for the action bar:



**Exhibit 3-12 Action Bar – Save**



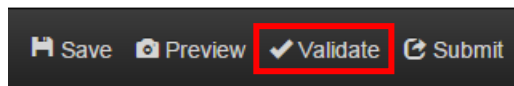
- **Preview:** Click the ‘Preview’ icon () at any stage of completing a TSCA Title VI form to view a .pdf rendering of the data entered on the form. For any TSCA Title VI form that contains CBI, click the ‘Regular PDF’ after clicking the ‘Preview’ icon () to view a regular .pdf of the form or click the ‘Sanitized PDF’ after clicking the ‘Preview’ icon () to view a sanitized .pdf of the form. If the form contains no CBI indications, then both the regular .pdf and the sanitized .pdf will be the same.



**Exhibit 3-13 Action Bar – Preview**



- **Validate:** Click the ‘Validate’ icon () at any stage of completing a TSCA Title VI form to validate the information entered in the entire form. An ‘Accreditation Body Application for Recognition Agreement Validation’ pop-up window generates when you click the ‘Validate’ icon () within an Accreditation Body Application for Recognition Agreement form if you disable the pop-up blocker within your internet browser. The ‘Accreditation Body Application for Recognition Agreement Validation’ pop-up window displays a report of all validation errors. The validation pop-up window may also display different titles, including ‘Failure to Comply Form Validation,’ and ‘Annual Report Validation.’ Refer to **Section 8** for more information on validating a form.

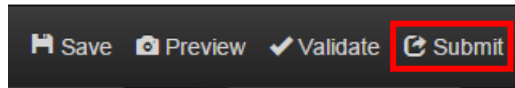
**Exhibit 3-14 Action Bar – Validate**



- **Submit:** Click the ‘Submit’ icon () to submit a TSCA Title VI form after you and/or an assigned Support have completed all sections of a TSCA Title VI form. After you click the ‘Submit’ icon () , a pop-up message displays to confirm the submission process. The form validates during the submission process and displays any applicable error messages. Refer to **Section 8** for further instructions on validation errors. You can continue with the submission process only after clearing all validation errors. Upon successful submission of the form, the ‘Status’ on the ‘Applications and Notifications’ screen will appear as ‘Pending’ and the

‘Status’ on the ‘Annual Reports’ screen will appear as ‘Submitted.’ Refer to **Section 10** for more information on submitting a TSCA Title VI form.

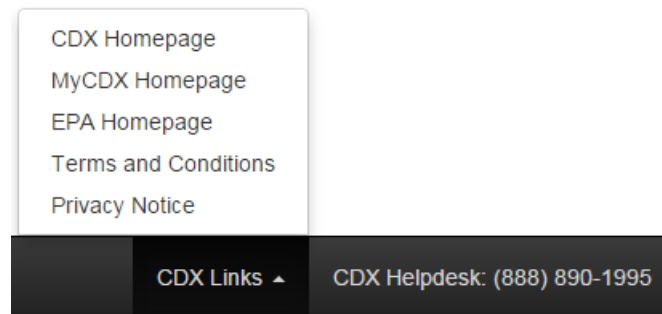
**Exhibit 3-15 Action Bar – Submit**



- **CDX Links:** Click the ‘CDX Links’ menu, located at the bottom of each screen, at any stage of completing a TSCA Title VI form.
  - Click the ‘CDX Homepage’ link to go to the CDX Login screen.
  - Click the ‘MyCDX Homepage’ link to go to your CDX user Homepage.
  - Click the ‘EPA Homepage’ link to go to EPA’s Homepage.
  - Click the ‘Terms and Conditions’ link to go to the CDX Terms and Conditions screen.
  - Click the ‘Privacy Notice’ link to go to the CDX Privacy and Security Notice screen.

Exhibit 3-16 shows a screen capture of the ‘CDX Links’ menu on the action bar:

**Exhibit 3-16 Action Bar – CDX Links**



### 3.10 Choose Laboratory

The ‘Choose Laboratory’ link displays on the ‘Failure to Comply Notification – Laboratory’ screen and the ‘Laboratory AB Annual Report’ screen. The ‘Choose Laboratory’ link is used to generate the ‘Failure to Comply Notification: Laboratory Search’ screen or the ‘Laboratory Assessments: Laboratory Search’ screen to search for and select the applicable sites for which you will be reporting.

On the ‘Failure to Comply Notification: Laboratory Search’ screen or the ‘Laboratory Assessments: Laboratory Search’ screen, enter in as much information related to the laboratory as possible to perform a search. The ‘Name’ and ‘Address 1’ fields must be populated on the ‘Laboratory Search’ screen in order for the search function to return results. Click the ‘Search Existing Labs’ button to search for existing laboratories based on the information that you have entered. If the laboratory information cannot be found, you have the opportunity to create a new laboratory.

The ‘Laboratory Search Results’ screen displays after clicking the ‘Search Existing Labs’ button on the ‘Laboratory Search’ screen. Based on the search criteria entered on the ‘Laboratory Search’ screen, a number of results may display. Select your laboratory from the list by clicking the ‘Laboratory Name’ link of the laboratory you would like to choose. If you do not see the

laboratory in the results, you may search again by entering in new information into the fields and clicking the ‘Search Existing Labs’ button, or you can add a new laboratory by clicking the ‘Add New Lab’ button.

If the system cannot find any laboratories based on the information entered on the ‘Laboratory Search’ screen, then the ‘Laboratory Search Results’ page will display no results.

The ‘Add New Laboratory’ screen displays after clicking the ‘Add New Lab’ button on the ‘Laboratory Search Results’ screen. Enter as much information as possible related to the new laboratory you would like to create at a minimum: the ‘Name,’ ‘Address 1,’ ‘City,’ ‘State,’ ‘Postal Code,’ and ‘Country’ fields are required. Once you have entered in the minimum information required to create a new laboratory, click the ‘Save New Lab’ button to add the laboratory to the list of existing laboratories and to the ‘Failure to Comply Notification – Laboratory’ screen or the ‘Laboratory AB Annual Report’ screen.

Click the ‘Choose Laboratory’ link on the ‘Failure to Comply Notification – Laboratory’ screen or the ‘Laboratory AB Annual Report’ screen to generate the ‘Laboratory Search’ screen, which displays the following fields: ‘Name,’ ‘Address 1,’ ‘Address 2,’ ‘City,’ ‘State,’ ‘Postal Code,’ and ‘Country.’

- **Name:** Enter or edit the name of the laboratory. This is a required field when searching for a laboratory or when adding a new laboratory.
- **Address 1:** Enter or edit the first line of the mailing address for the laboratory. This is a required field when searching for a laboratory or when adding a new laboratory.
- **Address 2:** Enter or edit the second line of the mailing address for the laboratory.
- **City:** Enter or edit the city of the mailing address for the laboratory. This is a required field when adding a new laboratory.
- **State:** Select or change the mailing address of the state for the laboratory. This is a required field when adding a new laboratory.
- **Postal Code:** Enter or edit the postal code of the mailing address for the laboratory. This is a required field when adding a new laboratory.
- **Country:** Select or change the country of the mailing address for the laboratory. This is a required field when adding a new laboratory.
- **Laboratory Name:** Displays the name of the lab. Click on the ‘Laboratory Name’ link to add the lab to the ‘Failure to Comply Notification – Laboratory’ screen or the ‘Laboratory AB Annual Report’ screen.
- **Laboratory Address:** Displays the address of the laboratory from which the search was initiated, if applicable.
- **Search Existing Labs:** Click the ‘Search Existing Labs’ button to conduct a search for the laboratory based on the information entered.
- **Add New Lab:** Click the ‘Add New Lab’ button to add a new laboratory to the main page from which you are initiating the search.



- **Save New Lab:** Click the ‘Save New Lab’ button to add the laboratory to the list of existing laboratories and to the ‘Failure to Comply Notification – Laboratory’ screen or the ‘Laboratory AB Annual Report’ screen.
- **Cancel:** Click the ‘Cancel’ button to cancel entering in laboratory information and navigate back to the ‘Failure to Comply Notification – Laboratory’ screen or the ‘Laboratory AB Annual Report’ screen without saving the entered information.

Exhibit 3-17 shows a screen capture of the ‘Failure to Comply Notification: Laboratory Search’ screen:

**Exhibit 3-17 Failure to Comply Notification: Laboratory Search Screen**

The screenshot displays the 'Failure to Comply: Choose Laboratory' interface. At the top, a navigation bar includes 'CSPP', 'Home', 'Applications and Notifications', 'Annual Reports', 'User Management', and 'Resources', along with the user 'Jane Doe, Accreditation Body (AB) Authorized Official'. The left sidebar shows a breadcrumb trail: 'AB-FC-27583' > 'Failure to Comply Notification' > 'Failure to Comply' > 'Choose Lab'. The main content area is titled 'Failure to Comply: Choose Laboratory' and contains a 'Search Existing Labs' section. This section includes a text box for 'Name' and a note: 'Use the search form below to search for existing laboratories. The 'Name' and 'Address 1' fields are required to improve the search results.' Below this are input fields for 'Address 1', 'Address 2', 'City', 'State' (a dropdown menu), 'Postal Code', and 'Country' (a dropdown menu). A note under 'Postal Code' states: 'If a postal code is not assigned to the facility, please enter 'N/A' in the postal code field.' At the bottom of the form are two buttons: 'Search Existing Labs' (highlighted with a red box) and 'Cancel'. The footer bar contains 'Save', 'Preview', 'Validate', 'Submit', 'Raise a Bug', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

Exhibit 3-18 shows a screen capture of the ‘Failure to Comply Notification: Laboratory Search Results’ screen:

**Exhibit 3-18 Failure to Comply Notification: Laboratory Search Results Screen**

CSPP Home Applications and Notifications Annual Reports User Management Resources
Jane Doe, Accreditation Body (AB) Authorized Official

AB-FC-27709

- Failure to Comply Notification
- Failure to Comply
- Choose Lab

Country

Laboratory Name	Laboratory Address
Lab Name 1	123 Some St, Fairfax, Virginia 22033, UNITED STATES
Lab Name 2	456 Some Other St, Lafayette, Louisiana 70506, UNITED STATES
Lab Name 3	789 Another St, City, Alabama 12345, UNITED STATES
Test Laboratory N/A	1234 Main Street, City, Alabama N/A, UNITED STATES
Joe Doe	123 Test Ave, City, Alaska N/A, UNITED STATES
Test Lab	Test, Test, California 00000, UNITED STATES
Michael Seavey	123 Test Street, Cityopolis, 03051, ANTIGUA AND BARBUDA
Test Lab	123 Main St, Fairfax, Virginia 22030, UNITED STATES
Test Lab	123 Spring St, Fairfax, Virginia 22030, UNITED STATES
<u>Test Contract Lab</u>	538 Cajundome Blvd, Lafayette, Louisiana 70506, UNITED STATES
Test Lab B	B St, City, 11111, CHINA
Contract Lab 1	111 Address, Ste 1, Fairfax, Virginia 22033, UNITED STATES
New lab 4132018	test, test, test, Alabama 70000, UNITED STATES
Lab1-4132018	test, test, test, Illinois 70000, UNITED STATES
sdfsdf sdfsdfy	123 STREET, SEATTLE, 43434, AZERBAIJAN
Testing Laboratory 1	123 Lab Street, City, Alabama N/A, UNITED STATES
newlab-rb	newlab-rb, newlab-rb, newlab-rb, 22033, AUSTRIA
laboratory1	12601 fairlakes cir, fairfax, Virginia 22033, UNITED STATES
Pradha Lab	Lab Ad, Lab Ad2, City, Louisiana 44333, UNITED STATES
Connelly Lab #2	123 CBI Way, Suite CBI, Lima, Ohio 45249, UNITED STATES
Connelly Lab #1	234 Mason Way, Cincinnati, Ohio 45249, UNITED STATES

Search Existing Labs
Add New Lab
Cancel

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

Exhibit 3-19 shows a screen capture of the ‘Failure to Comply Notification: Add New Laboratory’ screen:

### Exhibit 3-19 Failure to Comply Notification: Add New Laboratory Screen

The screenshot shows a web application interface for adding a new laboratory. The page title is "Failure to Comply: Choose Laboratory". The main content area contains a form with the following fields:

- Name: Text input field containing "Test Lab"
- Address 1: Text input field containing "Test"
- Address 2: Text input field (empty)
- City: Text input field containing "Test"
- State: Dropdown menu showing "California"
- Postal Code: Text input field containing "00000". Below this field is a note: "If a postal code is not assigned to the facility, please enter 'N/A' in the postal code field."
- Country: Dropdown menu showing "UNITED STATES"

At the bottom of the form, there are two buttons: "Save New Lab" (highlighted with a red box) and "Cancel".

The top navigation bar includes links for CSPP, Home, Applications and Notifications, Annual Reports, User Management, and Resources. The user is identified as "Joe Doe, Accreditation Body (AB) Authorized Official".

The bottom footer contains "Save", "Preview", "Validate", "Submit", "Raise a Bug", "CDX Links", and "CDX Helpdesk: (888) 890-1995".

**Navigation:** Click the ‘Save New Lab’ button to add the laboratory to the list of existing laboratories and to the ‘Failure to Comply Notification – Laboratory’ screen or the ‘Laboratory AB Annual Report’ screen.

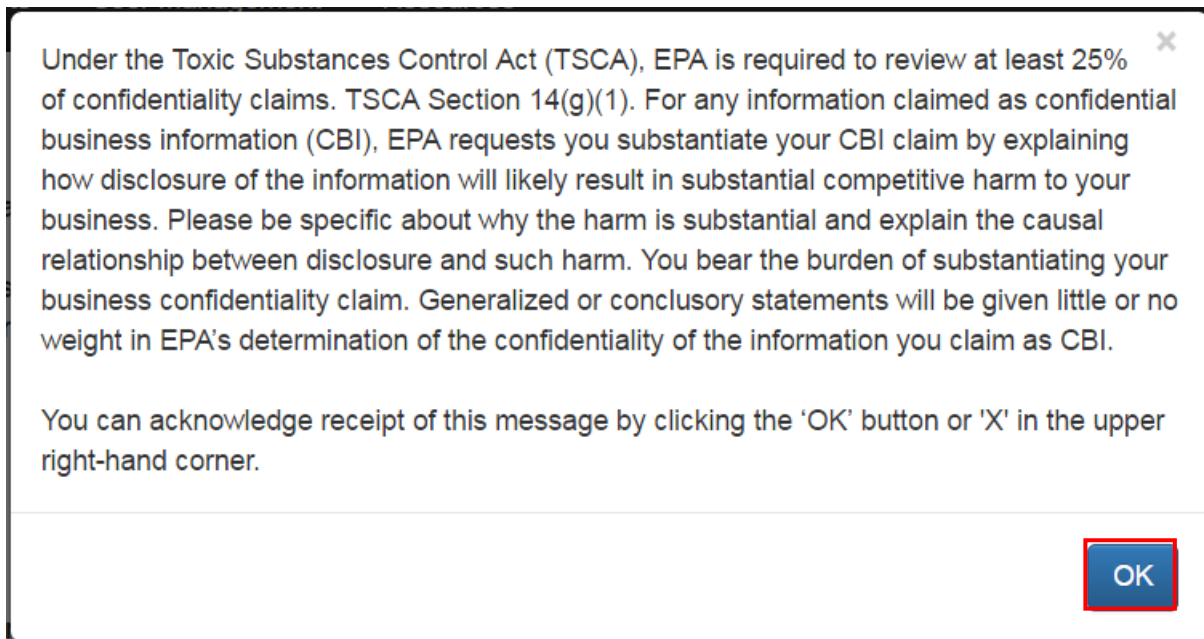
### 3.11 Confidential Business Information (CBI)

The CBI pop-up window displays every time you click on the CBI checkbox next to a field that can be claimed as CBI. After reading the text that appears in the pop-up window, you must click on the ‘OK’ button or the ‘X’ icon in the upper right-hand corner of the window to close the window and continue completing the form.

After clicking the CBI checkbox next to the field that you would like to claim as CBI and navigating back to the form, a ‘CBI Justification’ text box may appear underneath the field that has been claimed as CBI. This text box only appears for some CBI claims and an entry in the text box is not required.

Exhibit 3-20 shows a screen capture of the ‘Confidential Business Information’ pop-up window:

**Exhibit 3-20 Confidential Business Information Pop-Up Window**



**Navigation:** Click the ‘OK’ button or the ‘X’ icon in the upper right-hand corner of the window to close the window and navigate back to the form.

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## 4 Accreditation Body Application for Recognition Agreement

Title VI of TSCA establishes a third-party certification program to ensure that composite wood product panel producers comply with established formaldehyde emission limits. Under TSCA Title VI, TPCs would be required to apply to EPA-recognized ABs who would verify the TPC's ability to ensure that panel producers comply with the formaldehyde emission standards. Under TSCA Title VI, TPCs would audit composite wood product panel producers and verify compliance with the formaldehyde emission standards. For an AB to be recognized by EPA, they must submit an Accreditation Body Application for Recognition Agreement form.

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### 4.1 Create an Accreditation Body Application for Recognition Agreement

To create a new Accreditation Body Application for Recognition Agreement, navigate to the 'Applications and Notifications' screen and select 'Accreditation Body Application for Recognition Agreement' from the 'Select Form Type' drop-down menu. Refer to **Section 3.4** for additional details regarding the 'Applications and Notifications' screen.

Refer to **Section 3.6** for additional details regarding the create passphrase process.

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#### 4.1.1 Organization Information

The 'Organization Information' screen allows you to provide information about your organization and attach documentation outlining the AB's signatory status and qualifications. The system automatically imports your organization information that was entered during CDX registration, but allows you to edit the fields, as necessary.

To add a credential, click the 'Add' button. After entering in credential information, click the 'Save' button to enter the credential information into the 'Application Credentials' table or click the 'Cancel' button to discard the credential information.

The 'Application Credentials' table displays the file name of the document and the document type. The application allows you to delete unwanted documents by clicking the 'Delete' icon (✖) located in the 'Actions' column. The document type link located in the 'Document Type' column is a clickable link that allows you to view and edit the Application Credential listed in the table.

If 'Product' is selected as the Type of Accreditation Body, then at least one 'IAF MLA' (International Accreditation Forum Multilateral Recognition Arrangement), 'Regional Cooperative' or 'Other' document and one 'Qualifications and Experience' document must be attached. If 'Laboratory' is selected as the Type of Accreditation Body, then at least one 'ILAC MRA' (International Laboratory Accreditation Cooperation Mutual Recognition Arrangement), 'Regional Cooperative,' or 'Other' document and one 'Qualifications and Experience' document must be attached. If 'Product and Laboratory' is selected as the Type of Accreditation Body, then at least one 'IAF MLA' and 'ILAC MRA,' or 'Regional Cooperative' or 'Other' and one 'Qualifications and Experience' document must be attached.

- **Organization Name:** Displays the organization name of the logged-in user in a non-editable field.
- **CBI:** Check the 'CBI' checkbox to claim that the organization name is confidential.
- **Unique ID:** Displays the Unique ID of the Accreditation Body Application for Recognition Agreement form in a non-editable field. The AB Authorized Official is responsible for

providing the Unique ID of the Accreditation Body Application for Recognition Agreement to TPCs who wish to report to this AB.

- **Justification for Organization Name CBI:** Enter a CBI justification explanation in this text box. This field displays only if the ‘CBI’ checkbox next to the ‘Organization Name’ field is checked.
- **Organization Address 1:** Displays line 1 of the mailing address for the logged-in user. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim that the organization address is confidential.
- **Organization Address 2:** Displays line 2 of the mailing address for the logged-in user.
- **City:** Displays the U.S. or non-U.S. city of the mailing address for the logged-in user. This is a required field.
- **State:** Displays the state of the mailing address for the logged-in user within the drop-down menu. This field is required if the ‘Country’ field is set to ‘United States.’
- **Postal Code:** Displays the postal code of the mailing address for the logged-in user. This is a required field.
- **Country:** Contains the country of the mailing address for the logged-in user within the drop-down menu. This is a required field.
- **Justification for Address CBI:** Enter a CBI justification explanation in this text box. This field displays only if the ‘CBI’ checkbox next to the ‘Organization Address 1’ field is checked.
- **Phone Number:** Displays the phone number of the logged-in user. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim that the phone number is confidential.
- **Justification for Phone Number CBI:** Enter a CBI justification explanation in this text box. This field displays only if the ‘CBI’ checkbox next to the ‘Phone Number’ field is checked.
- **Business Email Address:** Enter the business email address for the AB Authorized Official’s organization.
- **CBI:** Check the ‘CBI’ checkbox to claim that the business email address is confidential.
- **Justification for Business Email Address CBI:** Enter a CBI justification explanation in this text box. This field displays only if the ‘CBI’ checkbox is checked next to the ‘Business Email Address’ field.
- **Website:** Enter the uniform resource locator (URL) for the Accreditation Body’s corporate website.
- **Type of Accreditation Body:** Select from a list of types of accreditation bodies. This drop-down menu contains the following values: ‘Product,’ ‘Laboratory,’ and ‘Product & Laboratory.’ This is a required field.
- **AB Experience:** The AB Experience text box generates if a selection is made from the ‘Type of Accreditation Body’ drop-down menu. Enter a description of the ABs experience in performing product accreditation of TPCs for manufactured products. This is a required field.

- **Document Type:** Displays the document type of the credential uploaded to the ‘Application Credentials’ table.
- **File Name:** Displays the file name of the credential uploaded to the ‘Application Credentials’ table.
- **Explanation:** Displays the explanation given for the ‘Other’ document type.
- **Link:** Displays the IAF MLA Listing Link information given for an application credential.
- **Actions:** Click the ‘Delete’ icon (✖) to delete the specified application credential.
- **Add:** Click this button to add a credential to the ‘Application Credentials’ table.
- **Document Type:** Select a value from the drop-down menu to identify the document type. This drop-down menu contains the following values: ‘IAF MLA,’ ‘ILAC MRA,’ ‘Regional Cooperative,’ ‘Qualifications and Experience,’ and ‘Other.’ This is a required field.
  - If ‘IAF MLA’ is selected as the document type, the application will record ‘International Accreditation Forum, Inc. (IAF)’ as the oversight body for the Accreditation Body.
  - If ‘ILAC MRA’ is selected as the document type, the system will record ‘International Laboratory Accreditation Cooperation (ILAC)’ as the oversight body for the Accreditation Body.
  - If ‘Other’ is selected, the system will record the data entry made in the ‘Document Type (Other) Explanation’ field as the oversight body for the Accreditation Body.
- **IAF MLA Listing Link:** Enter the URL for a user’s IAF MLA listing. This field displays only when ‘IAF MLA’ is selected from the ‘Document Type’ drop-down menu. This is a required field if ‘IAF MLA’ is selected from the drop-down menu.
- **Document Type (Other) Explanation:** Enter a description of the attached document. This field displays only when ‘Other’ is selected from the ‘Document Type’ drop-down menu. This is a required field if ‘Other’ is selected from the drop-down menu.
- **Browse:** Click the ‘Browse’ button to generate the ‘File Upload’ window to search a user’s local hard drive to attach a document. This is required field if a ‘Document Type’ value is selected.
- **CBI:** Check the ‘CBI’ checkbox to claim that the attached document is confidential.
- **Justification for Document CBI:** Enter a CBI justification explanation in this text box. This field displays only if the ‘CBI’ checkbox is checked.
- **Sanitized Document:** Click the ‘Browse’ button to generate the ‘File Upload’ window to search a user’s local hard drive to attach a document. For any attached document claimed as CBI, you will be required to attach a sanitized version of the document.
- **Save:** Click the ‘Save’ button to save the data entered and populate the ‘Application Credentials’ table on the ‘Organization Information’ screen.
- **Cancel:** Click the ‘Cancel’ button to cancel entering in an Application Credential and navigate back to the ‘Organization Information’ screen without saving the entered information.
- **Next:** Click the ‘Next’ button to navigate to the ‘Point of Contact’ screen.

Exhibit 4-1 shows a screen capture of the ‘Organization Information’ screen (Scroll 1):

### Exhibit 4-1 Organization Information Screen (Scroll 1)

CSPP   Home   Applications and Notifications   Annual Reports   User Management   Resources
Jane Doe, Accreditation Body (AB) Authorized Official

AB-APP-27507

- Accreditation Body Application for Recognition Agreement
  - Accreditation Body Registration
    - Organization Information
    - Point of Contact

## Organization Information

The below contact information has been imported from your CDX account. Enter application information in the below fields and attach required documentation of your ILAC/IAF signatory status or ILAC/IAF regional accreditation cooperation membership, experience, and qualifications. Check the 'CBI' checkbox next to a field to indicate that field as Confidential Business Information. **Note:** If the 'CBI' checkbox is marked for the 'Organization Name' field, then the AB Authorized Official is responsible for providing the Unique ID of the Accreditation Body Application for Recognition Agreement to Third-Party Certifiers who wish to report to this Accreditation Body.

Organization Name	<input type="text" value="TEST ORGANIZATION"/>	CBI <input checked="" type="checkbox"/>
Unique ID	<input type="text" value="AB-APP-27507"/>	
Justification for Organization Name CBI	<input type="text"/>	
Organization Address 1	<input type="text" value="01 UNDERGROUND ROAD"/>	CBI <input checked="" type="checkbox"/>
Organization Address 2	<input type="text"/>	
City	<input type="text" value="ATLANTIS"/>	
State	<input type="text" value="American Samoa"/>	
Postal Code	<input type="text" value="22015"/>	
	<small>If a postal code is not assigned to the facility, please enter 'N/A' in the postal code field.</small>	
Country	<input type="text" value="UNITED STATES"/>	
Justification for Address CBI	<input type="text"/>	
Phone Number	<input type="text" value="5555555555"/>	CBI <input checked="" type="checkbox"/>
Justification for Phone Number CBI	<input type="text"/>	

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



Exhibit 4-2 shows a screen capture of the ‘Organization Information’ screen (Scroll 2):

### Exhibit 4-2 Organization Information Screen (Scroll 2)

CSPP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

AB-APP-27507

- Accreditation Body Application for Recognition Agreement
- Accreditation Body Registration
  - Organization Information
  - Point of Contact

Justification for Phone Number CBI

Business Email Address

CBI

Justification for Business Email Address CBI

Website

Type of Accreditation Body

Product & Laboratory ▾

Please describe your experience in performing product accreditation of Third-Party Certifiers for manufactured products.

#### Application Credentials

Document Type	File Name	Explanation	Link	Actions
No entries have been added.				

Add

To add a new application credential, please click the 'Add' button. To edit an existing application credential, please click the credential's Document Type within the above list.

Document Type

▾

Document

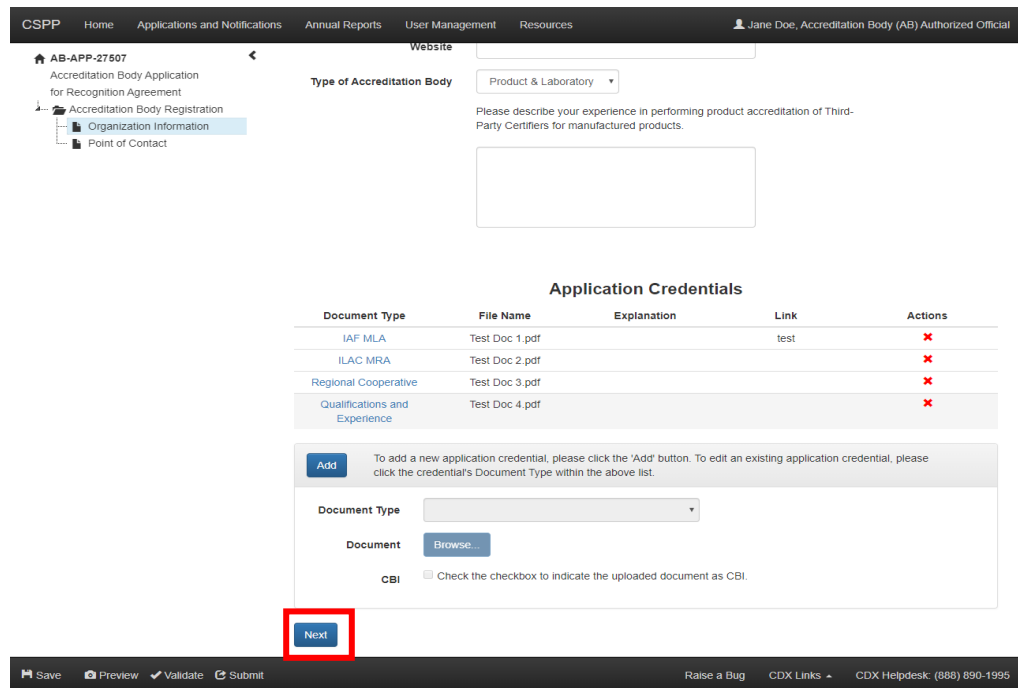
Browse...

CBI  Check the checkbox to indicate the uploaded document as CBI.

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

Exhibit 4-3 shows a screen capture of the ‘Organization Information’ screen (Scroll 3):

**Exhibit 4-3 Organization Information Screen (Scroll 3)**



**Navigation:** Click the ‘Next’ button to navigate to the ‘Point of Contact’ screen.

#### 4.1.2 Point of Contact

The ‘Point of Contact’ screen provides a user with the ability to enter information about the individuals who should be contacted regarding questions about the AB’s organization or information contained within the form for the AB. The point of contact can be the logged-in user or any other individual nominated as the point of contact.

If the user indicates that the organization of their AB is located outside of the United States on the ‘Organization Information’ screen, the user clicks the ‘Next’ button to navigate to the ‘US Agent Information’ screen.

If U.S. agent information is not required, click the ‘Next’ button to navigate to the ‘Recognition Agreement Approval – Product Accreditation Body’ or ‘Recognition Agreement Approval – Laboratory Accreditation Body’ screen(s).

- **Copy CDX Registration:** Click the ‘Copy CDX Registration’ button to copy the logged-in user’s CDX registration information onto the ‘Point of Contact’ screen.
- **Prefix:** Select the prefix for the point of contact from the drop-down menu.
- **First Name:** Enter the first name of the point of contact. This is a required field.
- **Middle Initial:** Enter the middle initial of the point of contact.
- **Last Name:** Enter the last name of the point of contact. This is a required field.
- **Suffix:** Select the suffix for the point of contact from the drop-down menu.
- **Job Title:** Enter the job title of the point of contact. This is a required field.

- **Organization Name:** Enter the organization name for the point of contact. This is a required field.
- **Phone Number:** Enter the phone number of the point of contact. This is a required field.
- **Email Address:** Enter the email address for the point of contact. This is a required field.
- **Mailing Address 1:** Enter the first line of the mailing address for the point of contact. This is a required field.
- **Mailing Address 2:** Enter the second line of the mailing address for the point of contact.
- **City:** Enter the city of the mailing address for the point of contact. This is a required field.
- **State:** Select the state of the mailing address for the point of contact. This is a required field if the ‘Country’ field is set to ‘United States.’
- **Postal Code:** Enter the postal code of the mailing address for the point of contact. This is a required field.
- **Country:** Select the country of the mailing address for the point of contact. This is a required field.

Exhibit 4-4 shows a screen capture of the ‘Point of Contact’ screen (Scroll 1):

**Exhibit 4-4 Point of Contact Screen (Scroll 1)**

**Point Of Contact**

The point of contact is the individual who should be contacted regarding your organization and/or the contents of its submissions. To identify a point of contact for your organization please enter information in the below fields. If you are your organization's point of contact you may click the 'Copy CDX Registration' button below to import your CDX registration information into the below fields.

Click here to copy your information from CDX Registration: [Copy CDX Registration](#)

Prefix

First Name

Middle Initial

Last Name

Suffix

Job Title

Organization Name

Phone Number

Email Address

Mailing Address 1

Mailing Address 2

City

State

Postal Code

Save Preview Validate Submit

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

Exhibit 4-5 shows a screen capture of the ‘Point of Contact’ screen (Scroll 2):

**Exhibit 4-5 Point of Contact Screen (Scroll 2)**

**Navigation:** Click the ‘Next’ button to navigate to the ‘US Agent Information’ screen, if applicable. You can also access this screen by clicking the ‘US Agent Information’ link within the navigation tree.

### 4.1.3 US Agent Information

ABs whose address is located outside of the United States must designate a U.S.-based agent.

The ‘US Agent Information’ screen captures the contact information of the U.S.-based agent.

- **CBI:** Check the ‘CBI’ checkbox to claim the U.S. Agent Information as confidential.
- **Justification for US Agent CBI:** Enter a CBI justification explanation in this text box. This field displays only if the ‘CBI’ checkbox is checked.
- **Prefix:** Select the U.S. agent’s prefix from the drop-down menu.
- **First Name:** Enter the U.S. agent’s first name. This is a required field.
- **Last Name:** Enter the U.S. agent’s last name. This is a required field.
- **Suffix:** Select the U.S. agent’s suffix from the drop-down menu.
- **Agent Organization Name:** Enter the U.S. agent’s organization name. This is a required field.
- **Phone Number:** Enter the U.S. agent’s phone number. This is a required field.
- **Email Address:** Enter the U.S. agent’s email address. This is a required field.

- **Mailing Address 1:** Enter the first line of the U.S. agent’s mailing address. This is a required field.
- **Mailing Address 2:** Enter the second line of the U.S. agent’s mailing address.
- **City:** Enter the city of the U.S. agent’s mailing address. This is a required field.
- **State:** Select the state of the U.S. agent’s mailing address. This is a required field.
- **Postal Code:** Enter the postal code of the U.S. agent’s mailing address. This is a required field.

Exhibit 4-6 and Exhibit 4-7 shows a screen capture of the ‘US Agent Information’ screen:

**Exhibit 4-6 US Agent Information Screen (Scroll 1)**

**US Agent Information**

To facilitate communication, Accreditation Bodies whose address is located outside of the United States are required to designate an agent based in the United States. Please enter the contact information for your United States-based agent in the below fields. Checking the 'CBI' checkbox below will claim all of the fields on this screen as CBI.

**CBI**  Check the checkbox to indicate the information on this page as CBI.

**Justification For US Agent CBI**

**Prefix**

**First Name**

**Last Name**

**Suffix**

**Agent Organization Name**

**Phone Number**

**Email Address**

**Mailing Address 1**

**Mailing Address 2**

**City**

**State**

**Postal Code**

If a postal code is not assigned to the facility,

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

## Exhibit 4-7 US Agent Information Screen (Scroll 2)

CSPP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

AB-APP-27507 Checking the 'CBI' checkbox below will claim all of the fields on this screen as CBI.

Accreditation Body Application for Recognition Agreement

- Accreditation Body Registration
  - Organization Information
  - Point of Contact
  - US Agent Information
  - Recognition Agreement
    - Approval – Laboratory Accreditation Body
    - Recognition Agreement Approval – Product Accreditation Body
- CBI Substantiation Documentation

**CBI**  Check the checkbox to indicate the information on this page as CBI.

**Justification For US Agent CBI**

**Prefix**

**First Name**

**Last Name**

**Suffix**

**Agent Organization Name**

**Phone Number**

**Email Address**

**Mailing Address 1**

**Mailing Address 2**

**City**

**State**

**Postal Code**

If a postal code is not assigned to the facility, please enter 'N/A' in the postal code field.

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

**Navigation:** Depending on the information you have entered on the ‘Organization Information’ screen, click the ‘Next’ button to navigate to the ‘Recognition Agreement Approval – Laboratory Accreditation Body’ screen or the ‘Recognition Agreement Approval – Product Accreditation Body’ screen. You can also access these screens by clicking the ‘Recognition Agreement Approval – Laboratory Accreditation Body’ link or the ‘Recognition Agreement Approval – Product Accreditation Body’ link within the navigation tree.

### 4.1.4 Recognition Agreement Approval – Laboratory Accreditation Body

The ‘Recognition Agreement Approval – Laboratory Accreditation Body’ screen provides you with the legal text of the recognition agreement for a Laboratory Accreditation Body and allows you to accept the terms of the recognition agreement. If this is the last screen of the form, you also must accept the affirmation and impartiality statements. You are required to accept the terms of the recognition agreement and the affirmation and impartiality statements to submit the form. This alerts EPA to review the form’s contents.

After you read the recognition agreement and the affirmation and impartiality statements (if applicable) and indicate understanding and acceptance, you can navigate to the ‘Recognition

Agreement Approval – ‘Product Accreditation Body’ screen (if applicable) by clicking the ‘Next’ button, or submit the form by clicking the ‘Submit’ button or the ‘Submit’ icon.

Exhibit 4-8 shows a screen capture of the ‘Recognition Agreement Approval-Laboratory Accreditation Body’ screen (Scroll 1):

**Exhibit 4-8 Recognition Agreement Approval-Laboratory Accreditation Body (Scroll 1)**

The screenshot shows the CSPP interface for the 'Recognition Agreement Approval-Laboratory Accreditation Body' screen. The user is Jane Doe, Accreditation Body (AB) Authorized Official. The left sidebar shows a navigation tree with 'Recognition Agreement Approval - Laboratory Accreditation Body' selected. The main content area is divided into three sections: Purpose, Background, and Definitions.

**I. Purpose**

The purpose of this Recognition Agreement between the Environmental Protection Agency's (EPA) Office of Pollution Prevention and Toxics (OPPT) and TEST ORGANIZATION is to recognize TEST ORGANIZATION as an EPA Toxic Substances Control Act Title VI Laboratory Accreditation Body (EPA TSCA Title VI Laboratory AB) working in cooperation with the EPA under the TSCA Title VI Third-Party Certification Program. The primary function of an EPA TSCA Title VI Laboratory AB is to provide an impartial verification of the competency of a laboratory or contract laboratory used by an EPA TSCA Title VI Third-Party Certifier (EPA TSCA Title VI TPC), also called a TPC laboratory.

**II. Background**

The regulations codified at 40 CFR part 770, subpart B, the EPA TSCA Title VI Third-Party Certification Program, establish a third-party certification program that helps ensure that composite wood product producers comply with the formaldehyde emission standards for composite wood products pursuant to the requirements of the Formaldehyde Standards for Composite Wood Products Act, or TSCA Title VI. The regulations codified at 40 CFR part 770, subpart B, establish that all TPC laboratories must be accredited by a Laboratory AB that is recognized by the EPA under TSCA Title VI. In order to qualify and participate in the TSCA Title VI Third-Party Certification Program, a candidate Laboratory AB must apply to the EPA and document that their organization is: (1) a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA), membership in one of the ILAC recognized regional accreditation cooperations, or an equivalent organization as determined by EPA, (2) in conformance with ISO/IEC 17011:2004(E), (3) competent to perform accreditation activities for laboratory accreditation according to ISO/IEC 17025:2005(E) and (4) competent to ensure EPA TSCA Title VI TPC inspection activities are in conformance with ISO/IEC 17020:2012(E). Once a candidate Laboratory AB is deemed qualified by the EPA, EPA will enter into a Recognition Agreement with the Laboratory AB, thereby establishing them as an EPA TSCA Title VI Laboratory AB.

**III. Definitions**

The following definitions can also be found in 40 CFR 770.3.

**Accreditation Body or AB** means an organization that provides an impartial verification of the competency of conformity assessment bodies or TPCs.

**EPA TSCA Title VI Laboratory Accreditation Body or EPA TSCA Title VI Laboratory AB** means an AB that has a recognition agreement with EPA under the EPA TSCA Title VI Third-Party Certification Program, accredits a TPC's testing laboratory or contract testing laboratory to ISO/IEC 17025:2005(E) with a scope of accreditation to include 40 CFR part 770 and the formaldehyde test methods used to comply with 40 CFR part 770, and assesses the testing laboratory's conformance to ISO/IEC 17020:2012(E) in order to perform laboratory testing services.

**EPA TSCA Title VI Third-Party Certifier or EPA TSCA Title VI TPC** means a conformity assessment body that provides both product certification services and laboratory testing services (either directly or through contracted services), is accredited by an EPA TSCA Title VI Laboratory AB and an EPA TSCA Title VI Laboratory AB (unless the laboratory testing services are contracted to a laboratory accredited by an EPA TSCA Title VI Laboratory AB), and is recognized by EPA pursuant to 40 CFR 770.7(c).

The bottom of the screen shows a navigation bar with 'Save', 'Preview', 'Validate', and 'Submit' buttons, and a footer with 'Raise a Bug', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

Exhibit 4-9 shows a screen capture of the ‘Recognition Agreement Approval-Laboratory Accreditation Body’ screen (Scroll 2):

**Exhibit 4-9 Recognition Agreement Approval-Laboratory Accreditation Body (Scroll 2)**

CSPP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

**AB-APP-27507**

- Accreditation Body Application for Recognition Agreement
- Accreditation Body Registration
    - Organization Information
    - Point of Contact
    - US Agent Information
    - Recognition Agreement
      - Approval – Laboratory Accreditation Body
      - Recognition Agreement Approval – Product Accreditation Body
  - CBI Substantiation Documentation

**EPA TSCA Title VI Third-Party Certifier or EPA TSCA Title VI TPC** means a conformity assessment body that provides both product certification services and laboratory testing services (either directly or through contracted services), is accredited by an EPA TSCA Title VI Laboratory AB and an EPA TSCA Title VI Laboratory AB (unless the laboratory testing services are contracted to a laboratory accredited by an EPA TSCA Title VI Laboratory AB), and is recognized by EPA pursuant to 40 CFR 770.7(c).

**TPC laboratory** means a laboratory or contract laboratory of an EPA TSCA Title VI TPC that is accredited by an EPA TSCA Title VI Laboratory AB to ISO/IEC 17025:2005(E), and whose inspection activities are in conformance with ISO/IEC 17020:2012(E).

**Laboratory Accreditation Body or Laboratory AB** means an AB that accredits conformity assessment body testing laboratories.

**IV. Authority**

Under TSCA Title VI, EPA must promulgate regulations to implement the formaldehyde emission standards in a manner that ensures compliance with those standards, including provisions related to a third-party testing and certification program. In exercising its discretion under the Act, EPA required that laboratory participants of the EPA TSCA Title VI Third-Party Certification Program be accredited by accreditation bodies recognized by EPA. Pursuant to the regulations at 40 CFR part 770, subpart B and as outlined in the Recognition Agreements, EPA TSCA Title VI Laboratory ABs will accredit laboratories for participation in the EPA TSCA Title VI Third-Party Certification Program and provide an impartial verification of the competency of laboratories or contract laboratories used by TPCs.

**V. Basis and Substance of Understanding**

After reviewing the information submitted by TEST ORGANIZATION pursuant to 40 CFR 770.7(b)(2), the EPA has determined that TEST ORGANIZATION meets the requirements for recognition under the EPA TSCA Title VI Third-Party Certification Program and is deemed an EPA TSCA Title VI Laboratory AB.

Pursuant to 40 CFR part 770, subpart B, TEST ORGANIZATION agrees to:

1. Act in accordance with all provisions and requirements listed under the EPA TSCA Title VI Laboratory AB responsibilities at 40 CFR 770.7(b)(4)-(5) including notifications to the EPA for the activities listed in 40 CFR 770.7(b)(5)(v); and
2. Electronically report through the EPA's Central Data Exchange (CDX) at <https://cdx.epa.gov/> for any reporting requirements listed under 40 CFR 770.7(b). If the CDX database becomes unavailable for any reason, EPA will provide an alternate electronic reporting method and notify the EPA TSCA Title VI Product ABs of how to access the alternate method.

Pursuant to 40 CFR part 770, subpart B, the Office of Pollution Prevention and Toxics as the overseeing EPA Office for the EPA TSCA Title VI Third-Party Certification Program agrees to:

1. Recognize TEST ORGANIZATION as an EPA TSCA Title VI Laboratory AB under the EPA TSCA Title VI Third-Party Certification Program; and
2. Provide guidance and interpretation, if requested and to the extent possible, on the EPA TSCA Title VI Third-Party Certification Program protocols and requirements, and provide notice to TEST ORGANIZATION when the EPA TSCA Title VI Third-Party Certification Program protocols, requirements, and performance standards have been amended including those listed at 40 CFR 770.7(b)(4)-(5).

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



Exhibit 4-10 shows a screen capture of the ‘Recognition Agreement Approval-Laboratory Accreditation Body’ screen (Scroll 3):

**Exhibit 4-10 Recognition Agreement Approval-Laboratory Accreditation Body (Scroll 3)**

CSPP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

AB-APP-27507  
Accreditation Body Application for Recognition Agreement

- Accreditation Body Registration
  - Organization Information
  - Point of Contact
  - US Agent Information
  - Recognition Agreement Approval - Laboratory Accreditation Body**
  - Recognition Agreement Approval - Product Accreditation Body
  - CBI Substantiation Documentation

2. Provide guidance and interpretation, if requested and to the extent possible, on the EPA TSCA Title VI Third-Party Certification Program protocols and requirements, and provide notice to TEST ORGANIZATION when the EPA TSCA Title VI Third-Party Certification Program protocols, requirements, and performance standards have been amended including those listed at 40 CFR 770.7(b)(4)-(5).

**VI. Duration of Recognition Agreement**

This Recognition Agreement shall be valid for three years as stated in 40 CFR 770.7(b)(3) and is subject to the renewal provisions stated therein.

**VII. Management and Implementation**

The TSCA Title VI Third-Party Certification Program is managed as a part of the EPA OPPT National Program Chemicals Division (NPCD) Formaldehyde Program. The responsibility for implementing and support of the program lies with NPCD personnel. Inquiries concerning the EPA TSCA Title VI Third-Party Certification Program and this Recognition Agreement can be addressed to the NPCD Implementation Officer for Recognition Agreements at:

TSCATitleVI-AB@epa.gov

**VIII. Funding**

All costs incurred by TEST ORGANIZATION to implement all provisions of this Recognition Agreement are the responsibility of TEST ORGANIZATION. Nothing in this Recognition Agreement shall be interpreted to constrain TEST ORGANIZATION's discretion to recover any costs by assessing fees to EPA TSCA Title VI TPCs and/or TPC laboratories for its services.

**IX. Revision or Termination**

This Recognition Agreement shall be effective upon signature, and shall remain effective for three years, after which time the EPA TSCA Title VI Laboratory AB will need to apply to renew the Recognition Agreement via the CDX database to renew its recognition in accordance with 40 CFR 770.7(b)(3). If the CDX database becomes unavailable for any reason, EPA will provide an alternate electronic reporting method and notify the EPA TSCA Title VI Laboratory ABs of how to access the alternate method. Should issues arise concerning the Recognition Agreement, the parties agree to seek resolution of any dispute through good faith discussions. The Recognition Agreement may be amended by agreement of both parties at any time prior to its expiration or termination. The Recognition Agreement may be terminated at any time with prompt written notice by TEST ORGANIZATION. EPA may also suspend, revoke, or modify the Recognition Agreement pursuant to 40 CFR 770.7(e)(2).

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

Exhibit 4-11 shows a screen capture of the ‘Recognition Agreement Approval-Laboratory Accreditation Body’ screen (Scroll 4):

**Exhibit 4-11 Recognition Agreement Approval-Laboratory Accreditation Body (Scroll 4)**

CSPP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

**AB-APP-27507**

Accreditation Body Application for Recognition Agreement

- Accreditation Body Registration
  - Organization Information
  - Point of Contact
  - US Agent Information
  - Recognition Agreement Approval – Laboratory Accreditation Body
  - Recognition Agreement Approval – Product Accreditation Body
- CBI Substantiation Documentation

in accordance with 40 CFR 770.7(b)(3). If the CDX database becomes unavailable for any reason, EPA will provide an alternate electronic reporting method and notify the EPA TSCA Title VI Laboratory ABs of how to access the alternate method. Should issues arise concerning the Recognition Agreement, the parties agree to seek resolution of any dispute through good faith discussions. The Recognition Agreement may be amended by agreement of both parties at any time prior to its expiration or termination. The Recognition Agreement may be terminated at any time with prompt written notice by TEST ORGANIZATION. EPA may also suspend, revoke, or modify the Recognition Agreement pursuant to 40 CFR 770.7(e)(2).

**X. Notice of EPA's Authority**

Nothing in this agreement shall be interpreted to curtail EPA's authority to independently revoke the recognition of any EPA TSCA Title VI TPC, inspect any EPA TSCA Title VI TPC, or otherwise enforce TSCA Title VI.

**XI. Implementation Officers for Recognition Agreements**

Whenever this Recognition Agreement provides for notice, such notice may be satisfied upon delivery electronically via CDX to the respective EPA and Laboratory AB Implementation Officers listed below:

Fiber and Organics Branch Chief	Jane Doe
U.S. Environmental Protection Agency	TEST ORGANIZATION
OPPT/NPCD (7404T)	01 UNDERGROUND ROAD
1200 Pennsylvania Avenue, N.W.	ATLANTIS, 22015
Washington, DC 20460	

Via CDX <https://cdx.epa.gov/>

**Organizational Approval**

The following decision officials are authorized to enter into the TSCA Title VI Third-Party Certification Program Recognition Agreements between the EPA and TEST ORGANIZATION:

Decision Official on Behalf of EPA/OPPT/NPCD

Director of National Program Chemicals Division

Primary Authorized Official on Behalf of TEST ORGANIZATION

Jane Doe

I have read, understand, and accept the terms and conditions outlined in the above recognition agreement.

Previous
Next

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

**Navigation:** Click the ‘Previous’ button to navigate back to the ‘US Agent Information’ screen if you indicated that your organization is outside of the United States on the ‘Organization Information’ screen, or to the ‘Point of Contact’ screen if you indicated that your organization is in the United States on the ‘Organization Information’ screen. Click the ‘Next’ button to navigate to the ‘Recognition Agreement Approval – Product Accreditation Body’ screen if applicable. Click the ‘Validate’ icon (☑) located in the bottom action bar to validate the form. Click the ‘Save’ icon (💾) located in the bottom action bar to perform a global save on the form. Click the ‘Preview’ icon (📄) located in the bottom action bar to view a PDF preview of the form. Click the ‘Submit’ icon (📤) located in the bottom action bar or the ‘Submit’ button that appears to begin the submission process if applicable.

#### 4.1.5 Recognition Agreement Approval – Product Accreditation Body

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The ‘Recognition Agreement Approval – Product Accreditation Body’ screen provides you with the legal text of the recognition agreement for a product Accreditation Body and allows you to accept the terms of the recognition agreement and the affirmation and impartiality statements. You are required to accept the terms of the recognition agreement and the affirmation and impartiality statements to submit the form. This alerts EPA to review the form’s contents.

After you read the recognition agreement, affirmation and impartiality statements and indicate understanding and acceptance, you can submit the form by clicking the ‘Submit’ button or the ‘Submit’ icon.

Exhibit 4-12 shows a screen capture of the ‘Recognition Agreement Approval-Product Accreditation Body’ screen (Scroll 1):

**Exhibit 4-12 Recognition Agreement Approval-Product Accreditation Body (Scroll 1)**

CSPP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

🏠 AB-APP-27507

Accreditation Body Application for Recognition Agreement

- 📁 Accreditation Body Registration
  - 📄 Organization Information
  - 📄 Point of Contact
  - 📄 US Agent Information
  - 📄 Recognition Agreement Approval – Laboratory Accreditation Body
  - 📄 Recognition Agreement Approval – Product Accreditation Body
- 📄 CBI Substantiation Documentation

## Recognition Agreement Approval-Product Accreditation Body

**I. Purpose**

The purpose of this Recognition Agreement between the Environmental Protection Agency’s (EPA) Office of Pollution Prevention and Toxics (OPPT) and TEST ORGANIZATION is to recognize TEST ORGANIZATION as an EPA Toxic Substances Control Act Title VI Product Accreditation Body (EPA TSCA Title VI Product AB) working in cooperation with the EPA under the TSCA Title VI Third-Party Certification Program. The primary function of an EPA TSCA Title VI Product AB is to provide an impartial verification of the competency of EPA TSCA Title VI Third-Party Certifiers (EPA TSCA Title VI TPCs).

**II. Background**

The regulations codified at 40 CFR part 770, subpart B, the EPA TSCA Title VI Third-Party Certification Program, establish a third-party certification program that helps ensure that composite wood product producers comply with the formaldehyde emission standards for composite wood products pursuant to the requirements of the Formaldehyde Standards for Composite Wood Products Act, or TSCA Title VI. The regulations codified at 40 CFR part 770, subpart B, establish that all EPA TSCA Title VI TPCs must be accredited by a Product AB that is recognized by the EPA under TSCA Title VI. In order to qualify and participate in the TSCA Title VI Third-Party Certification Program, a candidate Product AB must apply to the EPA and document that their organization is: (1) a signatory to the International Accreditation Forum, Inc. (IAF) Multilateral Recognition Arrangement (MLA) through level three, membership in one of the IAF recognized regional accreditation cooperations, or an equivalent organization as determined by EPA, (2) in conformance with ISO/IEC 17011:2004(E) and (3) competent to perform accreditation activities for product certification according to ISO/IEC 17065:2012(E). Once a candidate Product AB is deemed qualified by the EPA, EPA will enter into a Recognition Agreement with the Product AB, thereby establishing them as an EPA TSCA Title VI Product AB.

**III. Definitions**

The following definitions can also be found in 40 CFR 770.3.

**Accreditation Body or AB** means an organization that provides an impartial verification of the competency of conformity assessment bodies/TPCs.

**EPA TSCA Title VI Product Accreditation Body or EPA TSCA Title VI Product AB** means an AB that has a recognition agreement with EPA under the EPA TSCA Title VI Third-Party Certification Program, accredits a TPC to ISO/IEC 17065:2012(E) with a scope of accreditation to include composite wood products and 40 CFR part 770, and assesses the TPC’s conformance to ISO/IEC 17020:2012(E) in order to perform product certification.

**EPA TSCA Title VI Third-Party Certifier or EPA TSCA Title VI TPC** means a conformity assessment body that provides both product certification services and laboratory testing services (either directly or through contracted services), is accredited by an EPA TSCA Title VI Product AB and an EPA TSCA Title VI Laboratory AB (unless the laboratory testing services are contracted to a laboratory accredited by an EPA TSCA Title VI Laboratory AB), and is recognized by EPA pursuant to 40 CFR 770.7(c)(1).

**Product Accreditation Body or Product AB** means an AB that accredits conformity assessment bodies who perform product certification.

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

Exhibit 4-13 shows a screen capture of the ‘Recognition Agreement Approval-Product Accreditation Body’ screen (Scroll 2):

**Exhibit 4-13 Recognition Agreement Approval-Product Accreditation Body (Scroll 2)**

CSPP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

🏠 AB-APP-27507

Accreditation Body Application for Recognition Agreement

- 📁 Accreditation Body Registration
  - 📄 Organization Information
  - 📄 Point of Contact
  - 📄 US Agent Information
  - 📄 Recognition Agreement Approval – Laboratory Accreditation Body
  - 📄 Recognition Agreement Approval – Product Accreditation Body
  - 📄 CBI Substantiation Documentation

#### IV. Authority

Under TSCA Title VI, EPA must promulgate regulations to implement the formaldehyde emission standards in a manner that ensures compliance with those standards, including provisions related to a third-party testing and certification program. In exercising its discretion under the Act, EPA required that TPC participants of the EPA TSCA Title VI Third-Party Certification Program be accredited by accreditation bodies recognized by EPA. Pursuant to the regulations at 40 CFR part 770, subpart B and as outlined in the Recognition Agreements, EPA TSCA Title VI Product ABs will accredit TPCs for participation in the EPA TSCA Title VI Third-Party Certification Program and provide an impartial verification of the competency of TPCs.

#### V. Basis and Substance of Understanding

After reviewing the information submitted by TEST ORGANIZATION pursuant to 40 CFR 770.7(a)(2), the EPA has determined that TEST ORGANIZATION meets the requirements for recognition under the EPA TSCA Title VI Third-Party Certification Program and is deemed an EPA TSCA Title VI Product AB.

Pursuant to 40 CFR part 770, subpart B, TEST ORGANIZATION agrees to:

1. Act in accordance with all provisions and requirements listed under the EPA TSCA Title VI Product AB responsibilities at 40 CFR 770.7(a)(4)-(5) including notifications to the EPA for the activities listed in 40 CFR 770.7(a)(5)(iv); and
2. Electronically report through the EPA's Central Data Exchange (CDX) at <https://cdx.epa.gov/> for any reporting requirements listed under 40 CFR 770.7(a). If the CDX database becomes unavailable for any reason, EPA will provide an alternate electronic reporting method and notify the EPA TSCA Title VI Product ABs of how to access the alternate method.

Pursuant to 40 CFR part 770, subpart B, the Office of Pollution Prevention and Toxics as the overseeing EPA Office for the EPA TSCA Title VI Third-Party Certification Program agrees to:

1. Recognize TEST ORGANIZATION as an EPA TSCA Title VI Product AB under the EPA TSCA Title VI Third-Party Certification Program; and
2. Provide guidance and interpretation, if requested and to the extent possible, on the EPA TSCA Title VI Third-Party Certification Program protocols and requirements, and provide notice to TEST ORGANIZATION when the EPA TSCA Title VI Third-Party Certification Program protocols, requirements, and performance standards have been amended including those listed at 40 CFR 770.7(a)(4) and (5).

#### VI. Duration of Recognition Agreement

This Recognition Agreement shall be valid for three years as stated in 40 CFR 770.7(a)(3) and is subject to the renewal provisions stated therein.

#### VII. Management and Implementation

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

Exhibit 4-14 shows a screen capture of the ‘Recognition Agreement Approval-Product Accreditation Body’ screen (Scroll 3):

**Exhibit 4-14 Recognition Agreement Approval-Product Accreditation Body (Scroll 3)**

CSPP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

**AB-APP-27507**

- Accreditation Body Application for Recognition Agreement
- Accreditation Body Registration
    - Organization Information
    - Point of Contact
    - US Agent Information
    - Recognition Agreement
      - Approval – Laboratory Accreditation Body
      - Recognition Agreement Approval – Product Accreditation Body
  - CBI Substantiation Documentation

**VII. Management and Implementation**

The TSCA Title VI Third-Party Certification Program is managed as a part of the EPA OPPT National Program Chemicals Division (NPCD) Formaldehyde Program.

The responsibility for implementing and support of the program lies with NPCD personnel.

Inquiries concerning the EPA TSCA Title VI Third-Party Certification Program and this Recognition Agreement can be addressed to the NPCD Implementation Officer for Recognition Agreements at:

TSCATitleVI-AB@epa.gov

**VIII. Funding**

All costs incurred by TEST ORGANIZATION to implement all provisions of this Recognition Agreement are the responsibility of TEST ORGANIZATION. Nothing in this Recognition Agreement shall be interpreted to constrain TEST ORGANIZATION's discretion to recover any costs by assessing fees to EPA TSCA Title VI TPCs for its services.

**IX. Revision or Termination**

This Recognition Agreement shall be effective upon signature, and shall remain effective for three years, after which time the EPA TSCA Title VI Product AB will need to apply to renew the Recognition Agreement via the CDX database to renew its recognition in accordance with 40 CFR 770.7(a)(3). If the CDX database becomes unavailable for any reason, EPA will provide an alternate electronic reporting method and notify the EPA TSCA Title VI Product ABs of how to access the alternate method. Should issues arise concerning the Recognition Agreement, the parties agree to seek resolution of any dispute through good faith discussions. The Recognition Agreement may be amended by agreement of both parties at any time prior to its expiration or termination. The Recognition Agreement may be terminated at any time with prompt written notice by TEST ORGANIZATION. EPA may also suspend, revoke, or modify the Recognition Agreement pursuant to 40 CFR 770.7(e)(2).

**X. Notice of EPA's Authority**

Nothing in this agreement shall be interpreted to curtail EPA's authority to independently revoke the recognition of any EPA TSCA Title VI TPC, inspect any EPA TSCA Title VI TPC, or otherwise enforce TSCA Title VI.

**XI. Implementation Officers for Recognition Agreements**

Whenever this Recognition Agreement provides for notice, such notice may be satisfied upon delivery electronically via CDX to the respective EPA and Product AB Implementation Officers listed below:

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

Exhibit 4-15 shows a screen capture of the ‘Recognition Agreement Approval-Product Accreditation Body’ screen (Scroll 4):

**Exhibit 4-15 Recognition Agreement Approval-Product Accreditation Body (Scroll 4)**

The screenshot displays the CDX web application interface. At the top, there is a navigation bar with links for CSPP, Home, Applications and Notifications, Annual Reports, User Management, and Resources. The user is identified as Jane Doe, Accreditation Body (AB) Authorized Official.

The main content area is titled 'AB-APP-27507' and contains the following sections:

- Accreditation Body Application for Recognition Agreement**
  - Accreditation Body Registration
    - Organization Information
    - Point of Contact
    - US Agent Information
    - Recognition Agreement Approval – Laboratory Accreditation Body
    - Recognition Agreement Approval – Product Accreditation Body** (highlighted)
    - CBI Substantiation Documentation
- X. Notice of EPA's Authority**

Nothing in this agreement shall be interpreted to curtail EPA's authority to independently revoke the recognition of any EPA TSCA Title VI TPC, inspect any EPA TSCA Title VI TPC, or otherwise enforce TSCA Title VI.
- XI. Implementation Officers for Recognition Agreements**

Whenever this Recognition Agreement provides for notice, such notice may be satisfied upon delivery electronically via CDX to the respective EPA and Product AB Implementation Officers listed below:

Fiber and Organics Branch Chief U.S. Environmental Protection Agency OPPT/NPCD (7404T) 1200 Pennsylvania Avenue, N.W. Washington, DC 20460	Jane Doe TEST ORGANIZATION 01 UNDERGROUND ROAD ATLANTIS, 22015
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Via CDX <https://cdx.epa.gov/>
- Organizational Approval**

The following decision officials are authorized to enter into the TSCA Title VI Third-Party Certification Program Recognition Agreements between EPA and TEST ORGANIZATION:

Decision Official on Behalf of EPA/OPPT/NPCD

Director of National Program Chemicals Division

Primary Authorized Official on Behalf of TEST ORGANIZATION

Jane Doe

At the bottom of the main content area, there are two checkboxes:

- I have read, understand, and accept the terms and conditions outlined in the above recognition agreement.
- I affirm that upon receiving recognition from the EPA, I will act impartially when performing activities under the EPA TSCA Title VI Third-Party Certification Program, ensuring that an accreditation decision regarding a TPC is made by persons different from those who conducted the assessment of the TPC and ensuring that the AB's personnel who assesses TPCs or makes decisions regarding accreditation do not receive financial benefit from the outcome of an accreditation decision.

Below the checkboxes are two buttons: 'Previous' and 'Next' (highlighted with a red box).

The footer contains the following elements:

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

**Navigation:** Click the ‘Previous’ button to navigate back to the ‘US Agent Information’ screen, the ‘Point of Contact’ screen, or the ‘Recognition Agreement Approval – Laboratory Accreditation Body’ screen based on the information entered on the ‘Organization Information’ screen. Click the ‘Next’ button to navigate to the ‘CBI Substantiation Documentation’ screen. Click the ‘Validate’ icon (✓) located in the bottom action bar to validate the form. Click the ‘Save’ icon (F) located in the bottom action bar to perform a global save on the form. Click the ‘Preview’ icon (📄) located in the bottom action bar to view a PDF preview of the form. Click the ‘Submit’ icon (📤) located in the bottom action bar or the ‘Submit’ button that appears to begin the submission process.

## 4.2 Accreditation Body for Recognition Agreement Form Amendment

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The ‘Accreditation Body for Recognition Agreement Amendment’ screen displays various checkboxes and text boxes for a user to list the fields that were changed in the form amendment. This screen will only display if you have previously submitted a TSCA Title VI form and click the ‘Unlock’ icon in the ‘Actions’ column to begin the amendment process.

To indicate that this amendment is a renewal application, check the ‘Renewal Application’ checkbox and submit the form.

To withdraw your Accreditation Body from the TSCA Title VI TPC program, check the ‘Accreditation Body Voluntary Withdrawal’ checkbox and submit the form. You may also enter information describing your reason for withdrawal, but it is not required to submit the form.

To indicate that your Accreditation Body has lost its signatory status or membership, check the ‘Date of Loss of Signatory Status’ checkbox, click the calendar widget or the field, and select the date of loss of signatory status. If you would like to indicate the loss of signatory status as CBI, check the ‘CBI’ checkbox and enter in a reason for indicating this as CBI in the text box that appears.

To amend a submitted form, indicate any changes from the previous application in the ‘Changed Fields’ text box and navigate to the appropriate section of the form to make the changes listed. This is a required field. After making all necessary changes, click the ‘Submit’ button in the bottom action bar to resubmit the form.



Exhibit 4-16 shows a screen capture of the ‘Accreditation Body for Recognition Agreement Amendment’ screen:

**Exhibit 4-16 Accreditation Body for Recognition Agreement Amendment Screen**

**Amendment**

Select the below checkbox and submit the form to indicate that this amendment is a renewal application.

Renewal Application

Select the below checkbox and submit the form to voluntarily withdraw your Accreditation Body from the TSCA Title VI Third-Party Certification program. You may also enter information describing your reason for withdrawal, but it is not required to submit the form.

Accreditation Body Voluntary Withdrawal

Reason for Withdrawal (Optional):

Accreditation Bodies are required to report to EPA within five (5) business days of when they lose their status as a signatory to the ILAC MRA, status as a signatory to the IAF MLA, or lose their membership in an equivalent organization. Select the below checkbox, enter the date of the loss in the below field, and submit the form if your Accreditation Body has lost its signatory status or membership.

Date of Loss of Signatory Status  CBI

Date of Loss of Signatory Status:

To amend a submitted form, please indicate any changes from the previous application in the text area below and navigate to the appropriate section of the form to make the changes listed. After making all necessary changes, click the ‘Submit’ button in the bottom action bar to resubmit the form.

Changed Fields:

**Next**

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

**Navigation:** Click the ‘Next’ button to navigate to the other screens within the form to make any necessary edits or changes. Click the ‘Submit’ button at the bottom of the screen or ‘Submit’ icon in the bottom action bar to submit any changes made.

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## 5 Failure to Comply Notification Forms

Under TSCA Title VI, EPA-recognized Accreditation Bodies are required to verify a TPC or laboratory's failure to comply with EPA's formaldehyde emission standards or TSCA Title VI regulations.

### 5.1 Create Failure to Comply Notification – Third-Party Certifier Form

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To create a new Third-Party Certifier Failure to Comply Notification form, navigate to the 'Applications and Notifications' screen and select 'Failure to Comply Notification – Third-Party Certifier' from the 'Select Form Type' drop-down menu. Refer to **Section 3.4** for additional details regarding the 'Applications and Notifications' screen.

Refer to **Section 3.6** for additional details regarding the create passphrase process.

#### 5.1.1 Failure to Comply Notification – Third-Party Certifier

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The 'Failure to Comply Notification – Third-Party Certifier' screen provides you with the ability to enter information regarding a TPC that has failed to comply with TSCA Title VI regulations. To record a TPC failure to comply, select the TPC from the 'Third-Party Certifier' drop-down menu, then click the 'Add' button and enter the necessary information in the Failure to Comply fields.

The 'Third-Party Certifier' drop-down menu displays a list of all TPCs that have been approved by EPA and those that also have the Accreditation Body of the AB Authorized Official, selected in their TPC Application. The TPC must provide you with their Unique ID so that the appropriate selection can be made.

The 'Third-Party Certifier Failure to Comply' table displays the date of failure, failure type, whether the TPC accreditation has been suspended, reduced, or withdrawn, and allows you to delete failure to comply notifications by clicking the 'Delete' icon located under the 'Actions' column.

The 'Failure Type' field allows you to record different types of compliance failures and provides the option of reporting failure types that are not included by default in the 'Failure Type' drop-down menu.

To edit the information for previous failure to comply entries, click the failure type link to enable the failure to comply entry fields.

- **CBI:** Check the 'CBI' checkbox to claim the entirety of the submission as confidential.
- **Type:** Displays 'Third-Party Certifier.'
- **Third-Party Certifier:** Select the accredited TPC from the drop-down menu. The TPC will have to provide you with their Unique ID so that the appropriate selection can be made. This is a required field.
- **Date:** Displays the compliance failure date of the TPC. Information displays in this column once an entry is saved.
- **Failure Type:** Displays the failure type. Click the failure type link to enable the fields within the failure type table. Information displays in this column once an entry is saved.

- **Suspended:** Displays a ‘Y’ or an ‘N’ to indicate whether an AB has suspended accreditation of the TPC. Information displays in this column once an entry is saved.
- **Reduced:** Displays a ‘Y’ or an ‘N’ to indicate whether an accreditation body has reduced the accreditation of the TPC. Information displays in this column once an entry is saved.
- **Withdrawn:** Displays a ‘Y’ or an ‘N’ to indicate whether the TPC has voluntarily withdrawn from the TSCA Title VI Third-Party Certification program. Information displays in this column once an entry is saved.
- **Actions:** Click the ‘Delete’ icon (✖) to remove a TPC Failure to Comply entry. The icon displays in this column once an entry is saved.
- **Add:** Click the ‘Add’ button to enable the failure to comply entry fields.
- **Failure Date:** Click the calendar widget or the field and select the compliance failure date of the TPC. This is a required field.
- **Suspended:** Check the checkbox to indicate that an accreditation body has suspended accreditation of the TPC.
- **Reduced:** Check the checkbox to indicate that an accreditation body has reduced accreditation of the TPC.
- **Withdrawn:** Check the checkbox to indicate that the TPC has voluntarily withdrawn from the TSCA Title VI Third-Party Certification program.
- **Failure Type:** Select the compliance failure type from the drop-down menu. Select the ‘Other, please describe’ option to generate an ‘Other Description’ field. This is a required field.
- **Other Description:** Enter a description of the other failure type that is not captured within the ‘Failure Type’ drop-down menu. This is a required field if the ‘Other, please describe’ option is selected in the ‘Failure Type’ field.
- **Steps Taken to Address Deficiency:** Enter the steps that have been taken to remedy the identified failure(s).
- **Document (optional):** Click the ‘Browse’ button to generate the ‘File Upload’ window to search your local hard drive to attach a document.
- **Save:** Click the ‘Save’ button to save the data entered within the failure to comply entry fields.
- **Cancel:** Click the ‘Cancel’ button to discard the data entered/edited within the failure to comply entry fields.
- **Submit:** Click the ‘Submit’ button to submit the Third-Party Certifier Failure to Comply Notification form.

Exhibit 5-1 shows a screen capture of the ‘Failure to Comply Notification – Third-Party Certifier’ screen:

### Exhibit 5-1 Failure to Comply Notification – Third-Party Certifier Screen

CSP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

AB-FC-27574  
Failure to Comply Notification  
Failure to Comply

## Failure to Comply

To record a Third-Party Certifier's failure to comply with TSCA Title VI regulations, enter in the Third-Party Certifier's information in the below fields.

**CBI**  Check the checkbox to indicate the information on this page as CBI.

**Type** Third-Party Certifier

**Third-Party Certifier**

Date	Failure Type	Suspended	Reduced	Withdrawn	Actions
No entries have been added.					

Add

To add a new Failure to Comply entry, please click the 'Add' button. To edit an existing Failure to Comply entry, please click the entry's Failure Type within the above list.

**Failure Date**   **Suspended**  **Reduced**  **Withdrawn**

**Failure Type**

**Steps Taken to Address Deficiency**

**Document (optional)**

Submit

Save Preview Validate Submit

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

TSCA Title VI User Guide  
Accreditation Body Authorized Official

47

**Navigation:** Click the ‘Submit’ button at the bottom of the screen or the ‘Submit’ icon in the bottom action bar to submit the Third-Party Certifier Failure to Comply Notification form.

## 5.2 Create Failure to Comply Notification – Laboratory Form

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To create a new Laboratory Failure to Comply Notification form, navigate to the ‘Applications and Notifications’ screen and select ‘Failure to Comply Notification – Laboratory’ from the ‘Select Form Type’ drop-down menu. Refer to **Section 3.4** for additional details regarding the ‘Applications and Notifications’ screen.

Refer to **Section 3.6** for additional details regarding the create passphrase process.

### 5.2.1 Failure to Comply Notification – Laboratory

---

The ‘Failure to Comply Notification – Laboratory’ screen provides you with the ability to enter information regarding laboratories that fail to comply with TSCA Title VI regulations. To record a laboratory failure to comply, select a laboratory by clicking the ‘Choose Laboratory’ link, then click the ‘Add’ button and enter in the necessary information in the failure to comply fields.

Click the ‘Choose Laboratory’ link to navigate to the ‘Failure to Comply – Laboratory Search’ screen. The ‘Failure to Comply – Laboratory Search’ screen provides you with the ability to enter in information and search from a list of existing laboratories to enter the lab into the ‘Failure to Comply Notification – Laboratory’ screen. Refer to **Section 3.10** for more information regarding the ‘Choose Laboratory’ link.

The ‘Laboratory Failure to Comply’ table displays the date of failure, failure type, whether the accreditation of the Laboratory has been suspended, reduced, or withdrawn, and allows you to delete failure to comply notifications by clicking the ‘Delete’ icon located under the ‘Actions’ column.

The ‘Failure Type’ field allows you to record different types of compliance failures and provides the option of reporting failure types that are not included by default in the ‘Failure Type’ drop-down menu.

To edit the information for previous failure to comply entries, click the failure type link to enable the failure to comply entry fields.

- **CBI:** Check the ‘CBI’ checkbox to claim the entirety of the submission as confidential.
- **Type:** Displays ‘Laboratory.’
- **Laboratory:** Click the ‘Choose Laboratory’ link to choose and enter the accredited laboratory from a list of existing laboratories or add a new laboratory to the list. This is a required field. Refer to **Section 3.10** for more information regarding the ‘Choose Laboratory’ link.
- **Date:** Displays the laboratory’s compliance failure date. Information displays in this column once an entry is saved.
- **Failure Type:** Displays the failure type; click the failure type link to enable the fields within the failure type table. Information displays in this column once an entry is saved.
- **Suspended:** Displays a ‘Y’ or an ‘N’ to indicate whether an AB has suspended accreditation of the laboratory. Information displays in this column once an entry is saved.

- **Reduced:** Displays a ‘Y’ or an ‘N’ to indicate whether an AB has reduced accreditation of the laboratory. Information displays in this column once an entry is saved.
- **Withdrawn:** Displays a ‘Y’ or an ‘N’ to indicate whether the laboratory has voluntarily withdrawn from the TSCA Title VI Third-Party Certification program. Information displays in this column once an entry is saved.
- **Actions:** Click the ‘Delete’ icon (✖) to remove a Laboratory Failure to Comply entry. The icon displays in this column once an entry is saved.
- **Add:** Click the ‘Add’ button to enable the failure to comply entry fields.
- **Failure Date:** Click the calendar widget or the field and select the date of the laboratory’s failure to comply. This is a required field.
- **Suspended:** Check the checkbox to indicate that an AB has suspended accreditation of the laboratory.
- **Reduced:** Check the checkbox to indicate that an AB has reduced the accreditation of the laboratory.
- **Withdrawn:** Check the checkbox to indicate that the laboratory has withdrawn from the TSCA Title VI Third-Party Certification program.
- **Failure Type:** Select the compliance failure type from the drop-down menu. Selecting the ‘Other, please describe’ option generates an ‘Other Description’ field. This is a required field.
- **Other Description:** Enter a description of the other failure type that is not captured within the ‘Failure Type’ drop-down menu. This is a required field if the ‘Other, please describe’ option is selected in the ‘Failure Type’ field.
- **Steps Taken to Address Deficiency:** Enter the steps that have been taken to remedy the identified failure(s).
- **Document (optional):** Click the ‘Browse’ button to generate the ‘File Upload’ window to search the user’s local hard drive to attach a document.
- **Save:** Click the ‘Save’ button to save the data entered within the failure to comply entry fields.
- **Cancel:** Click the ‘Cancel’ button to discard the data entered/edited within the failure to comply entry fields.
- **Submit:** Click the ‘Submit’ button to submit the Laboratory Failure to Comply Notification form.

Exhibit 5-2 shows a screen capture of the ‘Failure to Comply Notification – Laboratory’ screen:

**Exhibit 5-2 Failure to Comply Notification – Laboratory Screen**

**Failure to Comply**

To record a Laboratory's failure to comply with TSCA Title VI regulations, enter in the Laboratory's information in the below fields.

**CBI**  Check the checkbox to indicate the information on this page as CBI.

**Type** Laboratory

**Laboratory** Test Lab  
123 Main St, Fairfax, Virginia 22030, UNITED STATES  
[Change Laboratory](#)

Date	Failure Type	Suspended	Reduced	Withdrawn	Actions
04/24/2020	(c)(1)(i)(A)-(D) Failed to timely submit a renewal application to a Product AB	Y	N	N	✖
04/09/2020	(c)(1)(ii)(C)(2) Laboratory or laboratories unable to conform to ISO/IEC 17025	N	Y	N	✖

**Add** To add a new Failure to Comply entry, please click the 'Add' button. To edit an existing Failure to Comply entry, please click the entry's Failure Type within the above list.

**Failure Date**   **Suspended**  **Reduced**  **Withdrawn**

**Failure Type**

**Steps Taken to Address Deficiency**

**Document (optional)**

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

**Navigation:** Click the ‘Submit’ button at the bottom of the screen or the ‘Submit’ icon in the action bar to submit the Laboratory Failure to Comply Notification form.

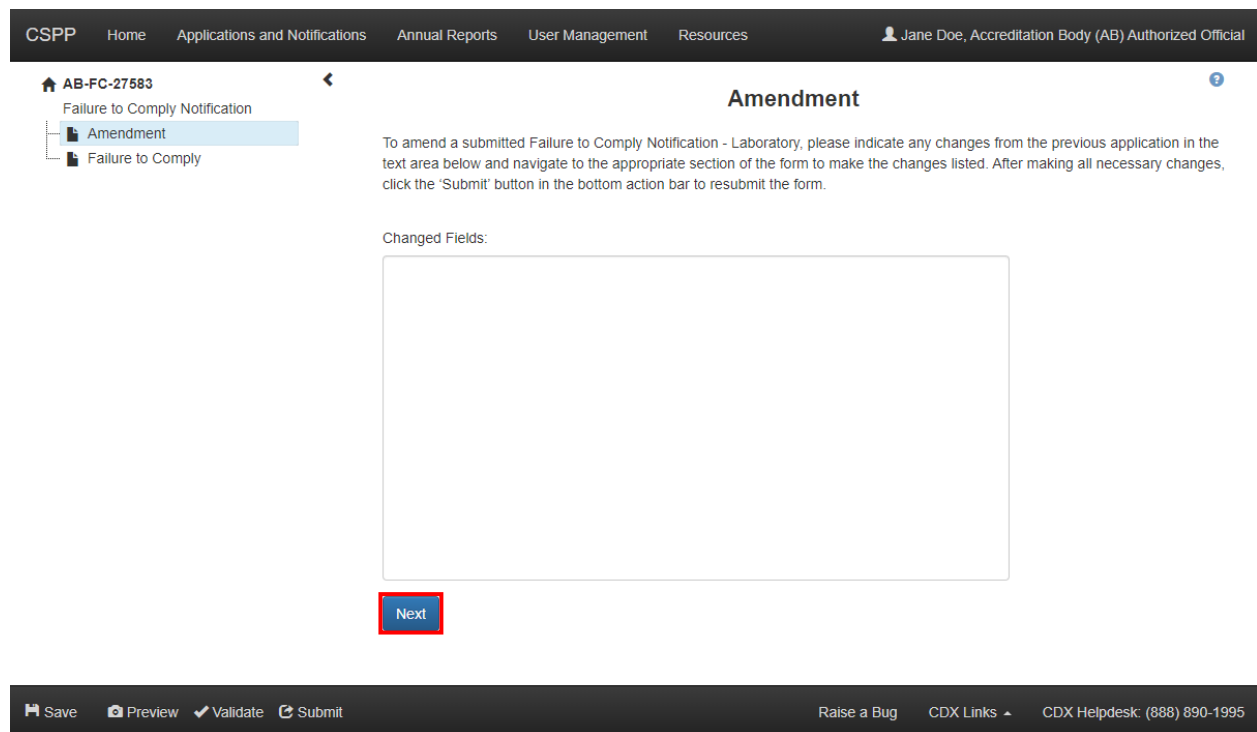
### 5.3 Failure to Comply Form Amendment

The ‘Failure to Comply Amendment’ screen displays a text box for a user to list the fields that were changed in the form amendment.

To amend a submitted form, indicate any changes from the previous form in the ‘Changed Fields’ text box and navigate to the appropriate section of the form to make the changes listed. After making all necessary changes, click the ‘Submit’ button in the bottom action bar to resubmit the form.

Exhibit 5-3 shows a screen capture of the ‘Failure to Comply Notification Amendment’ screen:

**Exhibit 5-3 Failure to Comply Notification Amendment Screen**



**Navigation:** Click the ‘Next’ button to navigate to the other screens of the form to make any edits or necessary changes. Click the ‘Submit’ button or ‘Submit’ icon in the action bar to submit any changes made.



## 6 Annual Report Forms

EPA-recognized ABs are required to report on a TPC's or Laboratory's ability to fulfill their responsibilities under EPA's TSCA Title VI regulations.

### 6.1 Create Product AB Annual Report Form

To create a new Product AB Annual Report form, navigate to the 'Annual Reports' screen and select 'Annual Report – Product AB' from the 'Select Annual Report Type' drop-down menu. Refer to **Section 3.5** for additional details regarding the 'Annual Reports' screen.

Refer to **Section 3.6** for additional details regarding the create passphrase process.

#### 6.1.1 Product AB Annual Report

The 'Product AB Annual Report' screen provides you with the ability to enter information regarding Product AB assessments. To record a Product AB assessment, click the 'Add' button and enter the necessary information in the assessment fields.

The 'Reporting Year' drop-down menu allows you to select the reporting year of the assessment.

The 'Product AB Assessment' table displays the TPC name, number of assessments, any attached documents, and allows you to delete assessments by clicking the 'Delete' icon located under the 'Actions' column.

Click the TPC link to enable and edit the information entered into the assessment entry fields.

- **CBI:** Check the 'CBI' checkbox to claim the entirety of the submission as confidential.
- **Reporting Year:** Select the reporting year from the drop-down menu.
- **Third-Party Certifier:** Displays the name of the TPC. Information will be displayed in this column once an entry is saved.
- **Number of Assessments:** Displays the number of assessments per TPC. Information will be displayed in this column once an entry is saved.
- **Document:** Displays any documents uploaded to the 'Product AB Assessment' table. Information displays in this column once an entry is saved.
- **Actions:** Click the 'Delete' icon (✖) to remove a Product AB Annual Report entry. The icon displays in this column once an entry is saved.
- **Add:** Click the 'Add' button to enable the assessment entry fields.
- **Third-Party Certifier:** Select the TPC from the drop-down menu for which you would like to report an assessment. The TPC will have to provide you with their Unique ID so that the appropriate selection can be made. This is a required field.
- **Document (optional):** Click the 'Browse' button to generate the 'File Upload' window to search a user's local hard drive to attach a document.
- **Add a new assessment:** Click the 'Add a new assessment' link to generate the 'Assessment Date' and 'Assessment Type' entry fields.
- **Assessment Date:** Click the calendar widget or the field and select the date of the TPC's assessment. This is a required field.

- **Assessment Type:** Select one of the following options from the ‘Assessment Type’ drop-down menu: ‘Assessment,’ ‘Reassessment,’ or ‘Surveillance On-Site Assessment.’ This is a required field.
- **Delete:** Click the delete icon (✖) to delete the assessment information entered.
- **Save:** Click the ‘Save’ button to save the information entered within the assessment entry fields.
- **Cancel:** Click the ‘Cancel’ button to discard the information entered within the assessment entry fields.
- **Submit:** Click the ‘Submit’ button to submit the Product AB Annual Report form.

Exhibit 6-1 shows a screen capture of the ‘Product AB Annual Report’ screen:

**Exhibit 6-1 Product AB Annual Report Screen**

**Product AB Annual Report**

To record a new Product Assessment that occurred during the reporting period, please click the *Add* button. To edit an existing Product Assessment entry, please click the *Third-Party Certifier's* link in the table below.

**CBI**  Check the checkbox to indicate the information on this page as CBI.

Reporting Year:

Third-Party Certifier	Number of Assessments	Document	Actions
<a href="#">TPC-APP-215</a>	1	Test Doc 1.pdf	✖
<a href="#">TPC-APP-14309</a>	2	Test Doc 2.pdf	✖

**Add** To add a new Assessment entry, please click the 'Add' button, and enter information in the following fields.

Third-Party Certifier:

Document (optional):

**Submit**

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

**Navigation:** Click the ‘Submit’ button at the bottom of the screen or the ‘Submit’ icon in the action bar to submit the Product AB Annual Report form.

## 6.2 Create Laboratory AB Annual Report Form

---

To create a new Laboratory AB Annual Report form, navigate to the ‘Annual Reports’ screen and select ‘Annual Report – Laboratory AB’ from the ‘Select Annual Report Type’ drop-down menu. Refer to **Section 3.5** for additional details regarding the ‘Annual Reports’ screen.

Refer to **Section 3.6** for additional details regarding the create passphrase process.

### 6.2.1 Laboratory AB Annual Report

---

The ‘Laboratory AB Annual Report’ screen provides you with the ability to enter information regarding assessments made by laboratories. To record a laboratory assessment, click the ‘Add’ button and enter the necessary information in the assessment fields.

The ‘Reporting Year’ field allows you to select the reporting year of the assessment from the drop-down menu.

The ‘Laboratory AB Assessment’ table displays the laboratory name, number of assessments, any attached documents, and allows you to delete assessments by clicking the ‘Delete’ icon located under the ‘Actions’ column.

To edit the information for previously entered assessments, click the laboratory link to enable the assessment entry fields.

- **CBI:** Check the ‘CBI’ checkbox to claim the entirety of the submission as confidential.
- **Reporting Year:** Select the reporting year from the drop-down menu.
- **Laboratory Unique Identification:** Displays the name of the laboratory. Information displays in this column once an entry is saved.
- **Number of Assessments:** Displays the number of assessments per laboratory. Information displays in this column once an entry is saved.
- **Document:** Displays any documents uploaded to the ‘Laboratory AB Assessment’ table. Information displays in this column once an entry is saved.
- **Actions:** Click the ‘Delete’ icon (✖) to remove a Laboratory AB Annual Report entry. The icon displays in this column once an entry is saved.
- **Add:** Click the ‘Add’ button to enable the assessment entry fields.
- **Laboratory:** Click the ‘Choose Laboratory’ link to generate the ‘Laboratory Search’ screen. This is a required field. Refer to **Section 3.10** for more information regarding the ‘Choose Laboratory’ link.
- **Document (optional):** Click the ‘Browse’ button to generate the ‘File Upload’ window to search your local hard drive to attach a document.
- **Add a new assessment:** Click the ‘Add a new assessment’ link to generate the ‘Assessment Date’ and ‘Assessment Type’ entry fields.
- **Assessment Date:** Click the calendar widget or the field and select the date of the laboratory’s assessment. This is a required field.

- **Assessment Type:** Select one of the following options from the ‘Assessment Type’ drop-down menu: ‘Assessment,’ ‘Reassessment,’ or ‘Surveillance On-Site Assessment.’ This is a required field.
- **Delete:** Click the delete icon (✖) to delete the assessment information entered.
- **Save:** Click the ‘Save’ button to save the information entered within the assessment entry fields.
- **Cancel:** Click the ‘Cancel’ button to discard the information entered within the assessment entry fields.
- **Submit:** Click the ‘Submit’ button to submit the Laboratory AB Annual Report form.

Exhibit 6-2 shows a screen capture of the ‘Laboratory AB Annual Report’ screen:

**Exhibit 6-2 Laboratory AB Annual Report Screen**

**Navigation:** Click the ‘Submit’ button at the bottom of the screen or the ‘Submit’ icon in the bottom action bar to submit the Laboratory AB Annual Report form.

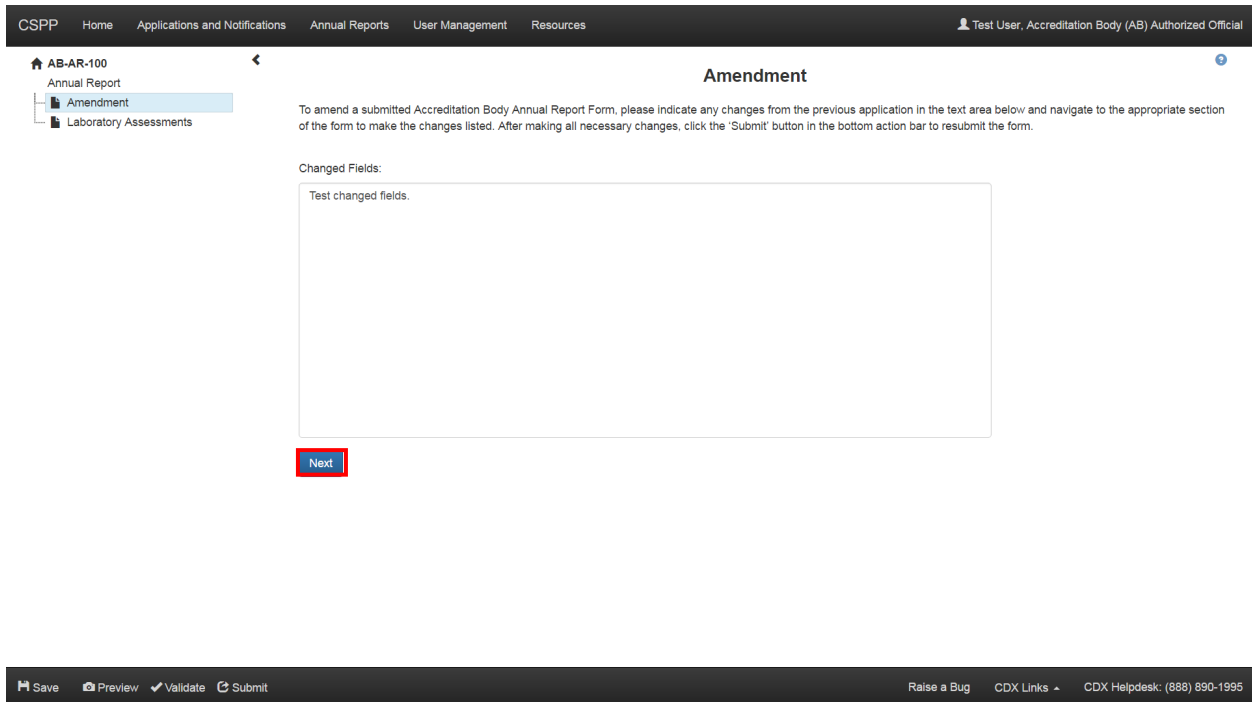
### 6.3 Annual Report Amendment

The ‘Annual Report Amendment’ screen displays a text box for a user to list the fields that were changed in the form amendment.

To amend a submitted form, indicate any changes from the previous application in the ‘Changed Fields’ text box and navigate to the appropriate section of the form to make the changes listed. After making all necessary changes, click the ‘Submit’ icon in the bottom action bar to resubmit the form.

Exhibit 6-3 shows a screen capture of the ‘Annual Report Amendment’ screen:

**Exhibit 6-3 Annual Report Amendment Screen**



**Navigation:** Click the ‘Next’ button to navigate to the other screens of the form to make any edits or changes necessary. Click the ‘Submit’ button or ‘Submit’ icon in the bottom action bar to submit any changes made.

## 7 Preview


The system provides the option to preview a form at any point during the submission process. Click the 'Preview' icon () , located within the bottom action bar, to see a PDF version of the form. A pop-up window will display the information entered in the form in a PDF format.

Exhibit 7-1 shows a screen capture for the preview of the AB form:

**Exhibit 7-1 Preview AB Form PDF**

Accreditation Body Application			
Unique Form ID:			
<b>Organization Information</b>			
Organization Name			CBI <input type="checkbox"/>
Mailing Address 1			CBI <input type="checkbox"/>
Mailing Address 2			
City	State	Postal Code	Country
Phone Number			CBI <input type="checkbox"/>
Web site			
Type of Accreditation Body			
Business Email Address			CBI <input type="checkbox"/>
AB Experience			
<b>Point Of Contact</b>			
Prefix	First Name	Last Name	Suffix
Job Title			
Organization Name			
Phone Number			
Email Address			
Mailing Address 1			
Mailing Address 2			
City	State	Postal Code	Country
<b>United States Agent</b>			CBI <input type="checkbox"/>
Prefix	First Name	Last Name	Suffix
Agent Organization Name			
Agent Address 1			



Exhibit 7-2 shows a screen capture for the preview of the Failure to Comply Notification form:

**Exhibit 7-2 Preview Failure to Comply Notification Form PDF**

Failure to Comply						
Failure to Comply Unique ID:						
Failure to Comply Details						CBI <input type="checkbox"/>
Failure to Comply Organization Name						
Type						
Third-Party Certifier Organization Name						
Failure List						
Failure Date	Failure Type	Suspended	Reduced	Withdrawn	Steps Taken to Address Deficiency	Document
Submitter						
Prefix	First Name			Last Name		Suffix
Organization Name						
Phone Number						
Email Address						
Mailing Address 1						
Mailing Address 2						
City	State	Postal Code	Country			



Exhibit 7-3 shows a screen capture for the preview of the Annual Report form:

**Exhibit 7-3 Preview Annual Report Form PDF**

Annual Report			
Annual Report Unique ID:			
Annual Report Details			CBI <input type="checkbox"/>
Submitter Organization Name			
Report Year			
Type			
Assessment List			
TPC Application Identification	Document	Number of Assessments	
Assessment Case List			
TPC Application Identification	Date	Type	
Amendment			
Changed Fields			
Submitter			
Prefix	First Name	Last Name	Suffix
Organization Name			
Phone Number			
Email Address			
Mailing Address 1			
Mailing Address 2			
City	State	Postal Code	Country



## 8 Validate

You can click the ‘Validate’ icon (✔) at any stage of completing a TSCA Title VI form. The ‘TSCA Title VI Validation’ pop-up window displays when you click the ‘Validate’ icon (✔). Disable the pop-up blocker within your internet browser so that the ‘TSCA Title VI Validation’ pop-up window displays correctly. The ‘TSCA Title VI Validation’ pop-up window displays a report of all validation errors. During the validation process, the application validates each screen of the TSCA Title VI form to find missing and invalid data.

**Validation Errors:** Errors can be fixed by clicking the error link. The links will display the screen title name (e.g., Failure to Comply) and the associated error. After you click a link, the main application screen will display the section where the error occurred so you can easily fix the error. Once you have fixed the error(s), click the ‘Validate’ icon (✔) again to refresh the ‘TSCA Title VI Validation’ pop-up window. If the information you fixed passes validation, the error will be removed from the ‘TSCA Title VI Validation’ pop-up window. You must fix all validation errors to submit the form to CDX successfully.

You can close the ‘TSCA Title VI Validation’ pop-up window by clicking the ‘X’ button located at the upper right-hand corner of the window.

Exhibit 8-1 shows a screen capture for the ‘TSCA Title VI Validation’ pop-up window:

**Exhibit 8-1 TSCA Title VI Validation Pop-Up Window**



## 9 CBI Substantiation

EPA modified the electronic reporting applications for TSCA submissions to accept CBI substantiations for CBI claims made during the creation of electronic submissions. Other than information exempt from substantiation under TSCA Section 14(c)(2), users who wish to assert CBI claims for data within a submission must substantiate those claims at the time of submission as required by TSCA Section 14(c)(3).

### 9.1 Instructions for Substantiating Confidential Business Information (CBI) Claims

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You can access the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen by claiming information as CBI within a form and clicking the ‘CBI Substantiation Documentation’ link within the navigation tree. **The ‘CBI Substantiation Documentation’ link and the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen will not generate until a CBI claim is made within a submission.** Information claimed CBI must either be substantiated or claimed exempt pursuant to TSCA Section 14(c)(2) at the time of submission.

To substantiate a CBI claim, upload documentation asserting your claim(s). You may also opt-out of substantiation if, for example, you believe your CBI claim is exempt under TSCA Section 14(c)(2). Common exemption reasons can be found at <https://www.epa.gov/tsca-cbi/what-information-include-cbi-substantiations>. To opt-out of substantiation at the time of submission, all CBI claims within a submission must be exempt.

- **Substantiation Opt-Out:** Certain data claimed as CBI might be exempt from substantiation at the time of submission. If all information contained within the submission was previously substantiated or you believe it to be exempt pursuant to TSCA Section 14(c)(2), check the ‘Substantiation Opt-Out’ checkbox to generate the ‘Substantiation Opt-Out Reason’ text box and hide the ‘File Upload’ button. Either a substantiation opt-out reason or CBI substantiation document must be provided if a CBI claim is made in a submission.
- **Substantiation Opt-Out Reason:** Enter information explaining why you believe your CBI claim(s) to be exempt from substantiation. Either a substantiation opt-out reason within the text box or CBI substantiation document must be provided if a CBI claim is made in a submission.
- **Select a file to attach:** Click the ‘Browse’ button to search your local machine and upload a file that contains your CBI substantiation. To overwrite an uploaded file, click the ‘Browse’ button again to search for and upload a new file. Either a substantiation opt-out reason or CBI substantiation document must be provided if a CBI claim is made in a submission.
- **CBI:** If the uploaded substantiation document contains CBI, check the ‘CBI’ checkbox to generate the ‘Sanitized Document’ field. A sanitized CBI substantiation document must be provided if the original substantiation document is claimed CBI.
- **Sanitized Document:** Click the ‘Browse’ button to search your local machine and upload a file that contains your sanitized CBI substantiation. To overwrite an uploaded file, click the ‘Browse’ button again to search for and upload a new file. A substantiation attachment must be provided if the original substantiation document is claimed CBI.

If you are unfamiliar with substantiating CBI claims or require assistance preparing substantiation documents, EPA offers a link to templates and other information for substantiating CBI claims on the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen. It is suggested that you right-click the link and open in a new tab or new window so you do not leave your submission as this may affect your saved data.

Exhibit 9-1 shows a screen capture of the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen (Scroll 1):

**Exhibit 9-1 Instructions for Substantiating Confidential Business Information (CBI) Claims Screen (Scroll 1)**

The screenshot displays the CDX application interface. At the top, the navigation bar includes 'CSPP', 'Home', 'Applications and Notifications', 'Annual Reports', 'User Management', and 'Resources'. The user is identified as 'Jane Doe, Accreditation Body (AB) Authorized Official'. The left sidebar shows a tree view of the application structure, with 'CBI Substantiation Documentation' selected. The main content area is titled 'Instructions for Substantiating Confidential Business Information (CBI) Claims'. The text explains that the Frank R. Lautenberg Chemical Safety for the 21st Century Act created new requirements for CBI claims in TSCA submissions. It lists information that can be claimed as CBI without substantiation, including:

- A. Specific information describing the processes used in manufacture or processing of a chemical substance, mixture, or article;
- B. Marketing and sales information;
- C. Information identifying a supplier or customer;
- D. In the case of a mixture, details of the full composition of the mixture and the respective percentages of constituents;
- E. Specific information regarding the use, function, or application of a chemical substance or mixture in a process, mixture, or article;
- F. Specific production or import volumes of the manufacturer or processor; and
- G. Prior to the date on which a chemical substance is first offered for commercial distribution, the specific chemical identity of the chemical substance, including the chemical name, molecular formula, Chemical Abstracts Service number, and other information that would identify the specific chemical substance, if the specific chemical identity was claimed as confidential at the time it was submitted in a notice under TSCA 5.

The text further states that for other submissions where the submitter has claimed information as CBI, they will be required to upload a substantiation document. It provides a link to <https://www.epa.gov/tscs-cbi/what-information-include-cbi-substantiations>. At the bottom, it notes that the Agency is required to review and make a determination on the validity of many CBI claims. Contact information for Scott Sherlock and Jessica Barkas is provided.

The footer of the interface includes buttons for 'Save', 'Preview', 'Validate', and 'Submit', along with 'Raise a Bug', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

Exhibit 9-2 shows a screen capture of the ‘Instructions for Substantiating CBI Claims’ Screen (Scroll 2) (Substantiation Opt-Out Example):

**Exhibit 9-2 Instructions for Substantiating CBI Claims Screen (Scroll 2) (Substantiation Opt-Out Example)**

The screenshot displays the CSPP web application interface. At the top, the navigation bar includes 'CSPP', 'Home', 'Applications and Notifications', 'Annual Reports', 'User Management', and 'Resources'. The user is logged in as 'Jane Doe, Accreditation Body (AB) Authorized Official'. The left sidebar shows a navigation tree for 'AB-APP-27507', with 'CBI Substantiation' and 'Documentation' selected. The main content area contains the following text:

C. Information identifying a supplier or customer;

D. In the case of a mixture, details of the full composition of the mixture and the respective percentages of constituents;

E. Specific information regarding the use, function, or application of a chemical substance or mixture in a process, mixture, or article;

F. Specific production or import volumes of the manufacturer or processor; and

G. Prior to the date on which a chemical substance is first offered for commercial distribution, the specific chemical identity of the chemical substance, including the chemical name, molecular formula, Chemical Abstracts Service number, and other information that would identify the specific chemical substance, if the specific chemical identity was claimed as confidential at the time it was submitted in a notice under TSCA 5.

For other submissions where the submitter has claimed information as CBI, the submitter will be required to upload a document substantiating those CBI claims at the time of submission. The substantiation document should provide EPA any information believed to support the validity of the CBI claims. In order to assist submitters in substantiating their CBI claims, EPA has developed substantiation templates that may be used as a starting point in preparing their CBI substantiations. Submitters are encouraged to use these substantiation template documents, but are not required to do so. The templates and other information relating to substantiating CBI claims can be found at <https://www.epa.gov/tscs-cbi/what-information-include-cbi-substantiations>.

The Agency is required to review and make a determination on the validity of many CBI claims. Failure to substantiate a CBI claim or a substantiation that does not adequately justify the claim may result in a denial of claims and subsequent public release of information. If you have any questions concerning the options or the substantiation process, please contact:

- Scott Sherlock, 202-564-8257, [sherlock.scott@epa.gov](mailto:sherlock.scott@epa.gov)
- Jessica Barkas, 202-250-8880, [barkas.jessica@epa.gov](mailto:barkas.jessica@epa.gov)

If you believe all of the information you have claimed as CBI is exempt from substantiation under TSCA section 14(c)(2) or has been previously substantiated, select the following "Substantiation Opt-Out" checkbox and provide a detailed explanation why you believe substantiation is not required.

**Substantiation Opt-Out:**

**Substantiation Opt-Out Reason:**

Buttons for 'Previous' and 'Submit' are visible at the bottom of the content area.

The footer of the application includes 'Save', 'Preview', 'Validate', 'Submit', 'Raise a Bug', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

Exhibit 9-3 shows a screen capture of the ‘Instructions for Substantiating CBI Claims’ Screen (Scroll 3) (Sanitized Substantiation Upload Example):

**Exhibit 9-3 Instructions for Substantiating CBI Claims Screen (Scroll 3) (Sanitized Substantiation Upload Example)**

CSPP Home Applications and Notifications Annual Reports User Management Resources Jane Doe, Accreditation Body (AB) Authorized Official

AB-APP-27507  
 Accreditation Body Application for Recognition Agreement

- Accreditation Body Registration
  - Organization Information
  - Point of Contact
  - US Agent Information
  - Recognition Agreement Approval – Laboratory Accreditation Body
  - Recognition Agreement Approval – Product Accreditation Body
  - CBI Substantiation Documentation**

E. Specific information regarding the use, function, or application of a chemical substance or mixture in a process, mixture, or article;

F. Specific production or import volumes of the manufacturer or processor; and

G. Prior to the date on which a chemical substance is first offered for commercial distribution, the specific chemical identity of the chemical substance, including the chemical name, molecular formula, Chemical Abstracts Service number, and other information that would identify the specific chemical substance, if the specific chemical identity was claimed as confidential at the time it was submitted in a notice under TSCA 5.

For other submissions where the submitter has claimed information as CBI, the submitter will be required to upload a document substantiating those CBI claims at the time of submission. The substantiation document should provide EPA any information believed to support the validity of the CBI claims. In order to assist submitters in substantiating their CBI claims, EPA has developed substantiation templates that may be used as a starting point in preparing their CBI substantiations. Submitters are encouraged to use these substantiation template documents, but are not required to do so. The templates and other information relating to substantiating CBI claims can be found at <https://www.epa.gov/tsc-cbi/what-information-include-cbi-substantiations>.

The Agency is required to review and make a determination on the validity of many CBI claims. Failure to substantiate a CBI claim or a substantiation that does not adequately justify the claim may result in a denial of claims and subsequent public release of information. If you have any questions concerning the options or the substantiation process, please contact:

- Scott Sherlock, 202-564-8257, [sherlock.scott@epa.gov](mailto:sherlock.scott@epa.gov)
- Jessica Barkas, 202-250-8880, [barkas.jessica@epa.gov](mailto:barkas.jessica@epa.gov)

If you believe all of the information you have claimed as CBI is exempt from substantiation under TSCA section 14(c)(2) or has been previously substantiated, select the following “Substantiation Opt-Out” checkbox and provide a detailed explanation why you believe substantiation is not required.

Substantiation Opt-Out:

Select a file to attach (will write over previously attached file if present):  CBI Doc 1.docx

CBI:  Check the checkbox to indicate the uploaded document as CBI.

Sanitized Document:  Sanitized Doc 1.docx


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

## 10 Submit to EPA via CDX

As an AB Authorized Official, you have the ability to sign and submit a TSCA Title VI form to EPA via CDX. You can save your form at any point during the data entry process. Assigned Supports cannot submit the TSCA Title VI form on your behalf. The save functionality will allow you to return to that same form at any point in the future.

Once you complete all required information and correct all items failing validation, the system will allow the TSCA Title VI form to be successfully submitted.

### 10.1 Submission Process: Validate

Click the ‘Submit’ icon () that is located in the bottom action bar of the TSCA Title VI application to access the ‘Submission Process: Validate’ screen. This screen only displays to an AB Authorized Official upon submission.

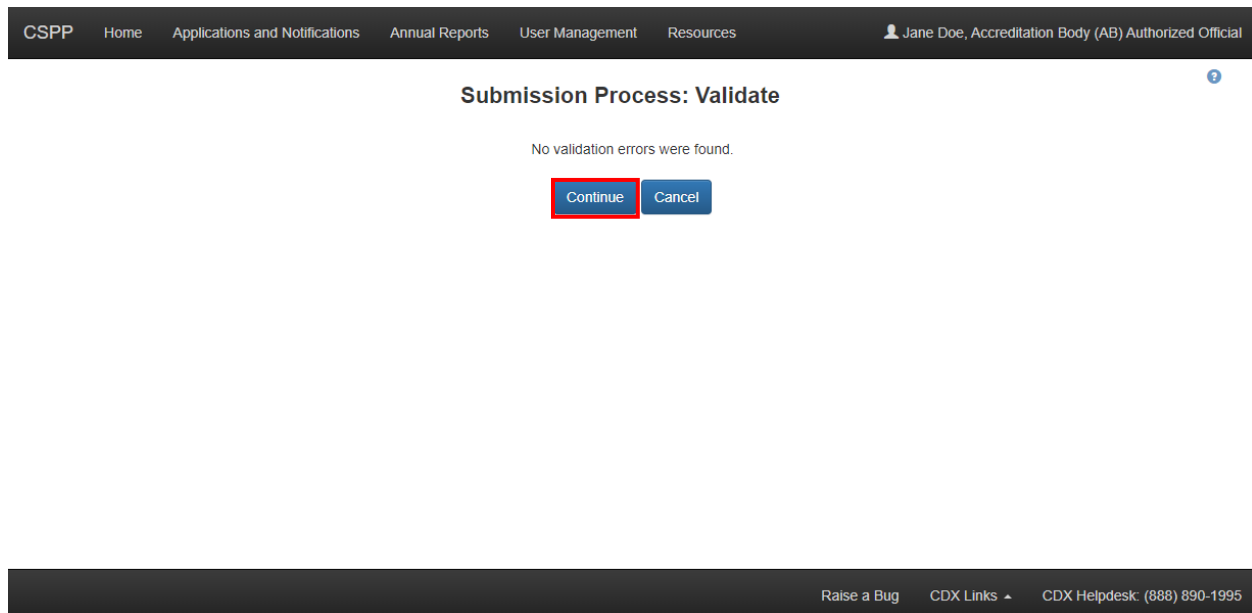
The ‘Submission Process: Validate’ screen displays after clicking the ‘Submit’ button or icon in the bottom action bar and validates the data in your form.

If there are errors in the form, an error message displays and the ‘TSCA Title VI: Validate’ pop-up window displays. You can navigate back to the form you were submitting to make the appropriate corrections by clicking the ‘Cancel’ button on the ‘Submission Process: Validate’ screen.

If there are no errors in the form, clicking the ‘Continue’ button will navigate you to the ‘Submission Process: PDF Generation’ screen.

Exhibit 10-1 shows a screen capture of the ‘Submission Process: Validate’ screen:

#### Exhibit 10-1 Submission Process: Validate Screen



The screenshot displays the 'Submission Process: Validate' screen. At the top, there is a navigation bar with links for CSPP, Home, Applications and Notifications, Annual Reports, User Management, and Resources. The user is identified as Jane Doe, Accreditation Body (AB) Authorized Official. The main heading is 'Submission Process: Validate'. Below the heading, it states 'No validation errors were found.' There are two buttons: 'Continue' (highlighted with a red box) and 'Cancel'.

**Navigation:** Click the ‘Continue’ button to continue submitting the form and navigating to the ‘Submission Process: PDF Generation’ screen.

## 10.2 Submission Process: PDF Generation Screen

The ‘Submission Process: PDF Generation’ screen displays after navigating away from the ‘Submission Process: Validate’ screen. It displays a ‘View PDF,’ ‘View Sanitized PDF,’ ‘Cancel,’ and ‘Continue’ button to proceed with the submission process.

Click the ‘View PDF’ button on the ‘Submission Process: PDF Generation’ screen to generate a pop-up window displaying a .pdf version of the submitted form.

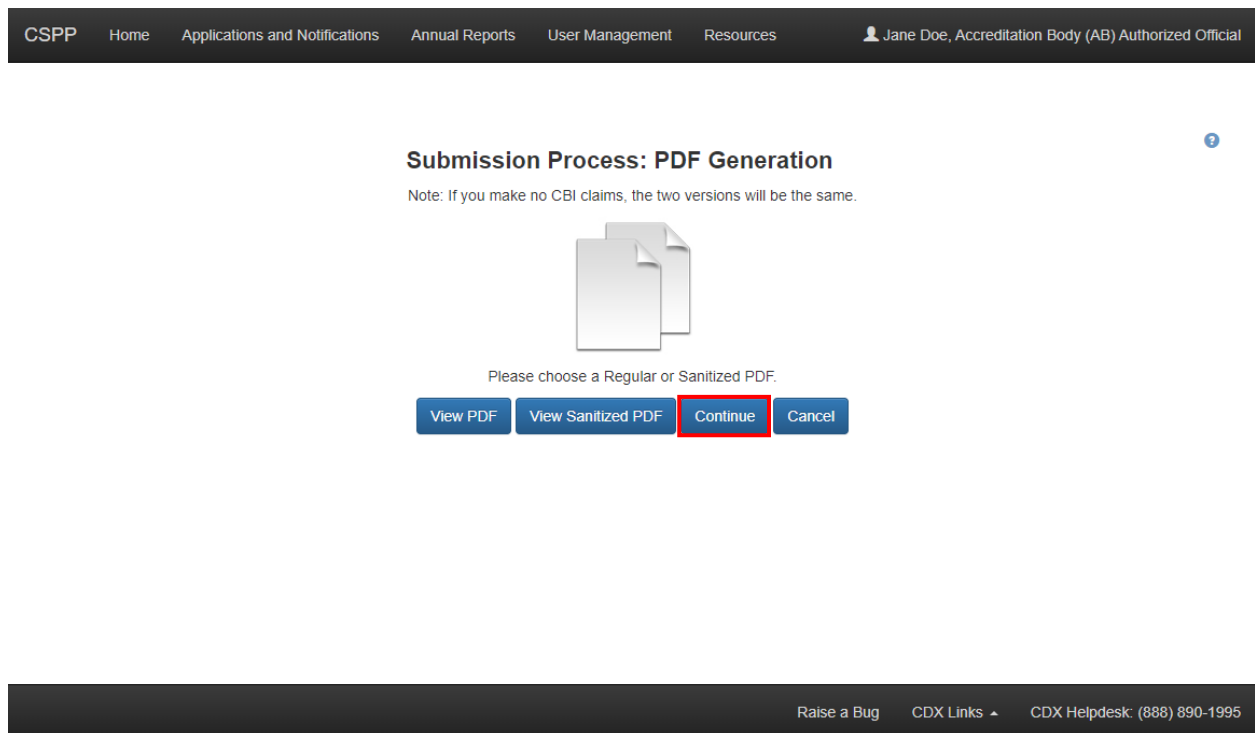
Click the ‘View Sanitized PDF’ button on the ‘Submission Process: PDF Generation’ screen to generate a pop-up window displaying a sanitized .pdf version of the submitted form. If you make no CBI claims on a submission, the ‘View PDF’ and ‘View Sanitized PDF’ versions will be the same.

Click the ‘Continue’ button to navigate to the ‘Cross-Media Electronic Reporting Regulation (CROMERR) Submission’ screen.

Click the ‘Cancel’ button to navigate back to the form you were submitting.

Exhibit 10-2 shows a screen capture of the ‘Submission Process: PDF Generation’ screen:

**Exhibit 10-2 Submission Process: PDF Generation Screen**



**Navigation:** Click the ‘Continue’ button to continue with submitting the form and navigating to the ‘Cross-Media Electronic Reporting Regulation (CROMERR) Submission’ screen.

### 10.3 Cross-Media Electronic Reporting Regulation (CROMERR) Submission Screen

The ‘CROMERR Submission’ screen displays your user ID and blank password field for you to enter your CDX password.

Click the ‘Next’ button to generate the ‘Answer Secret Question’ field set. A secret question displays with a blank answer field. The secret question will be one that you selected during CDX registration. Enter the answer to the secret question.

Click the ‘Next’ button to generate the ‘Certify’ field set.

Click the ‘Submit’ button to navigate to the ‘Success’ field set. Click the ‘Submit’ button to submit the form to CDX.

Click the ‘Finish’ button to navigate to the ‘Applications and Notifications’ screen. Click the ‘Finish’ button to acknowledge submission of the form to CDX.

Exhibit 10-3 shows a screen capture for the ‘Cross-Media Electronic Reporting Regulation (CROMERR) Submission’ screen:

**Exhibit 10-3 Cross-Media Electronic Reporting Regulation (CROMERR) Submission Screen**

The screenshot displays the 'Cross-Media Electronic Reporting Regulation (CROMERR) Submission' interface. At the top, a navigation bar includes links for CSPP, Home, Applications and Notifications, Annual Reports, User Management, and Resources. The user is identified as 'Jane Doe, Accreditation Body (AB) Authorized Official'. The main content area is divided into four panels:

- Log in to CDX:** Shows the 'User ID' as 'JANEDOEV' and a blank 'Password' field. 'Next' and 'Cancel' buttons are at the bottom.
- Answer Secret Question:** Displays the question 'Who is your favorite author?' and a blank 'Answer' field. 'Next' and 'Cancel' buttons are at the bottom.
- Certify:** Contains a certification statement: '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 confidentiality made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that:'. Below this are four numbered items (i) through (iv) regarding confidentiality and harm. A disclaimer at the bottom states: 'Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.' 'Submit' and 'Cancel' buttons are at the bottom.
- Success:** Displays the message: 'The submission was sent to EPA. The Copy of Record link to allow for the download of the Copy of Record and signature for this submission will appear in the forms list when EPA receives and processes your submission.' A red-bordered 'Finish' button is highlighted at the bottom.

At the bottom of the page, a footer bar contains links for 'Raise a Bug', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

**Navigation:** Click the ‘Finish’ button to complete the submission process and proceed to the ‘Applications and Notifications’ screen.



## 11 Download Copy of Record

To download a Copy of Record, navigate to the ‘Applications and Notifications’ screen or the ‘Annual Reports’ screen and locate a Unique ID for which you have successfully completed a submission and which has a status of ‘Pending,’ ‘Approved,’ ‘Rejected,’ or ‘Submitted.’

Click the ‘Copy of Record’ icon (📄) from the ‘Applications and Notifications’ screen or the ‘Annual Reports’ screen and enter in the passphrase that is associated with the form’s Copy of Record. Click the ‘Next’ button to navigate to the ‘Cross-Media Electronic Reporting Regulation (CROMERR) Login’ screen where you are required to enter the credentials that you provided during CDX registration. Once you have provided the correct CDX login information, click the ‘Next’ button to navigate to the ‘Answer Secret Question’ field set. Enter the answer to the secret question and click the ‘Next’ button to navigate to the ‘Copy of Record’ screen.

The ‘Copy of Record’ screen displays the ‘File Name,’ ‘File Size,’ and ‘Actions’ columns in a table format. The ‘Copy of Record’ screen also gives the option to Download EPA Communications and displays the ‘Communication Type,’ ‘File Name,’ ‘File Size,’ ‘Status,’ and ‘Download’ columns in a table format. Click the ‘Download Document’ icon (📄) to download the individual files uploaded during the submission process or a PDF version of the TSCA Title VI form.

Exhibit 11-1 shows a screen capture of the ‘Copy of Record’ screen:

**Exhibit 11-1 Copy of Record Screen**

To download a Copy of Record, click on the green arrow under the Actions column.

File Name	File Size	Actions
TEST ORG_AB-FC-3901.pdf	22776	📄
TEST DOC.docx	16449	📄

Download EPA Communications:

Communication Type	File Name	File Size	Status	Download
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[Home](#)

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

**Navigation:** Click ‘Download’ icon (📄) under the ‘Actions’ column to download a Copy of Record. Click the ‘Home’ button to navigate to the ‘TSCA Title VI Home’ screen.

## 12 EPA Communications

EPA may send electronic communications related to specific CDX submissions. In the event EPA sends an electronic communication, the original submitter will receive a notification to both their registered email address and inbox within CDX. The notification will inform the user that there is a new, submission-specific communication available from EPA.

Exhibit 12-1 shows a screen capture of a sample Email Notification from CDX:

### **Exhibit 12-1 New EPA Communication Email Notification**

Date: 01/29/2018 16:51:17

You have received a new communication from EPA. You may download a copy of your communication document from the reporting module's "Submission" page in CDX. The "Resources" tab in CDX also contains information that you may find useful, such as links to user guides, programmatic homepages, and information on how to contact EPA should you have questions.

CDX transactionId: \_ab94cf06-7241-4bde-baa1-dffb913b9955

Submission Alias: AB-APP-3799

Exhibit 12-2 shows a screen capture of a sample Inbox Notification:

### Exhibit 12-2 New EPA Communication CDX Inbox Notification

The screenshot shows the EPA CDX Central Data Exchange interface. At the top left is the EPA logo and the text "United States Environmental Protection Agency". A navigation bar contains links for Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. Below this is the "CDX Central Data Exchange" header, with a "Contact Us" link and the text "Logged in as JOEDOE12 (Log out)". A secondary navigation bar includes MyCDX, Inbox (highlighted), My Profile, Submission History, and E-Enterprise Portal. The main content area displays a notification titled "New Communication Received from EPA" with the following details: From: helpdesk@epacdx.net, Date: 1/29/2018 4:51:17 PM. Below this is a horizontal line, followed by the date "Date: 01/29/2018 16:51:17". The notification text states: "You have received a new communication from EPA. You may download a copy of your communication document from the reporting module's 'Submission' page in CDX. The 'Resources' tab in CDX also contains information that you may find useful, such as links to user guides, programmatic homepages, and information on how to contact EPA should you have questions." Below the text are the fields "CDX transactionId: \_ab94cf06-7241-4bde-baa1-dffb913b9955" and "Submission Alias: AB-APP-3799". At the bottom of the notification are three buttons: "Back to Inbox", "Print", and "Delete". The footer of the page includes "CDX Help Desk: 888-890-1995 | (970) 494-5500 for International callers", "EPA Home", "Privacy and Security Notice", "Accessibility", "About CDX", "Frequently Asked Questions", "Terms and Conditions", "Contact Us", and the EPA logo.



Users can access EPA communications by logging into CDX and navigating to the CSPP application to which a communication applies. Within the TSCA Title VI application, users should navigate to the ‘Applications and Notifications’ screen or the ‘Annual Reports’ screen, depending on which form the communication applies to, to access EPA communications. A ‘Closed Envelope’ icon () appears under the ‘Actions’ column for a submission that contains a new EPA communication, and an ‘Open Envelope’ icon () displays for a submission that contains a previously downloaded EPA communication. To access a communication, click either the ‘Closed Envelope,’ ‘Open Envelope,’ or ‘Copy of Record’ icon. To ensure EPA communications are not improperly viewed, access to EPA communications is restricted to users who may access the copy of record for a submission. Additionally, EPA captures and stores CDX user and timestamp data each time an EPA communication is accessed.









Exhibit 12-3 shows a screen capture of the ‘Applications and Notifications’ screen containing a new EPA communication:

### Exhibit 12-3 Applications and Notifications Screen

**Applications and Notifications**

- If submitting a form for the first time in the TSCA Title VI application, select a form from the ‘Select Form Type’ drop-down menu and click the ‘Start New Form’ button.
- To edit an ‘In Progress’ form, click the Unique ID link in the Unique ID column in the table below.
- To access and edit a form previously submitted through CDX, unlock the form by clicking the lock icon. All additional changes made to an application and/or notification form will be submitted as an amendment.  
An amendment must be submitted to capture information regarding a change in accreditation status including the suspension, reduction or withdrawal of accreditation.
- To download a copy of record for a submitted form, click the green arrow icon.
- To delete any form that has not yet been submitted, click the delete icon.
- All columns may be sorted by clicking the column header.
- Once a form has been completed, click the “Submit” button to begin the submission process.

5 entries found. Items Per Page: 25

Unique ID	Form Type	Status	Modify Date	Submission Date	Actions
AB-APP-3799	Accreditation Body Application for Recognition Agreement	Approved	01/22/2018	01/22/2018	  
AB-FC-3901	Accreditation Body Failure to Comply Notification	Submitted	01/22/2018	01/22/2018	 
AB-APP-3779	Accreditation Body Application for Recognition Agreement	In Progress	01/29/2018		
AB-FC-3914	Accreditation Body Failure to Comply Notification	In Progress	01/29/2018		
AB-FC-5078	Accreditation Body Failure to Comply Notification	In Progress	01/29/2018		

Export options: [CSV](#) | [Excel](#) | [XML](#) | [PDF](#)

Select Form Type  
Failure to Comply Notification - Third-Party Certifier

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**Navigation:** Click the ‘Closed Envelope,’ ‘Open Envelope,’ or ‘Copy of Record’ icon to navigate to the ‘Enter Passphrase’ screen and enter the passphrase that is associated with the submission. Then, click the ‘Continue’ button to navigate to the ‘Cross-Media Electronic Reporting Regulation (CROMERR) Login’ screen where you are required to enter the credentials that you provided during CDX registration. Once you have provided the correct CDX login information, click the ‘Next’ button to navigate to the ‘Answer Secret Question’ field set. Enter the answer to the 20-5-1 question and click the ‘Next’ button to navigate to the ‘Copy of Record’ screen.

The ‘Download EPA Communications’ table is located at the bottom of the ‘Copy of Record’ screen and displays EPA communications associated with all versions of the selected submission. The ‘Download EPA Communications’ table includes the following columns of information:

- **Communication Type:** Displays the type of EPA communication.
- **File Name:** Displays the file name of the EPA communication.
- **File Size:** Displays the file size of the EPA communication.
- **Status:** Displays the status of the EPA communication. The ‘Closed Envelope’ icon (📁) indicates an un-accessed EPA communication, and the ‘Open Envelope’ icon (📁) indicates an accessed EPA communication.
- **Download:** Click the ‘Download’ icon (⬇️) to download an EPA communication. The communication file downloads as a PDF.

Exhibit 12-4 shows a screen capture of the ‘Copy of Record’ screen with the ‘Download EPA Communications’ table at the bottom:


**Exhibit 12-4 Copy of Record Screen**

The screenshot shows the 'Copy of Record' screen with a navigation bar at the top containing 'CSPP', 'Home', 'Applications and Notifications', 'Annual Reports', 'User Management', 'Resources', and a user profile for 'Joe Doe, Accreditation Body (AB) Authorized Official'. Below the navigation bar is the title 'Copy of Record' and a blue help icon. A message states: 'To download a Copy of Record, click on the green arrow under the Actions column.' Below this is a table with three columns: 'File Name', 'File Size', and 'Actions'. The table contains five rows of test documents. Below this table is the section 'Download EPA Communications:' followed by a table with columns: 'Communication Type', 'File Name', 'File Size', 'Status', and 'Download'. The 'Download' column for the first row is highlighted with a red box. At the bottom left is a 'Home' button, and at the bottom right is a footer with 'Raise a Bug', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

File Name	File Size	Actions
TEST ORG_AB-APP-3799.pdf	51773	⬇️
TEST DOC.docx	16449	⬇️
TEST DOC.docx	16449	⬇️
TEST DOC.docx	16449	⬇️
TEST DOC.docx	16449	⬇️

Communication Type	File Name	File Size	Status	Download
Acknowledgement Letters	CdxCommunication831694f4-fd47-4fc4-98f4-c1941775601b.pdf	6761	📁	⬇️

**Navigation:** Click the ‘Download’ icon (  ) under the ‘Download EPA Communications’ table to download the EPA communication file. Click the ‘Home’ button to return to the TSCA Title VI ‘Home’ screen.

## 13 Create an Amendment

To amend a submitted TSCA Title VI form, navigate to the ‘Applications and Notifications’ or ‘Annual Reports’ screen and locate a submission that you previously submitted with a status of ‘Approved,’ ‘Rejected,’ or ‘Submitted.’ In addition to displaying a status of ‘Approved,’ ‘Rejected,’ or ‘Submitted’ under the ‘Status’ column, the ‘Lock’ icon (🔒) displays under the ‘Actions’ column. Click the ‘Lock’ icon (🔒) under the ‘Actions’ column and enter in the passphrase associated with that submission to start an amendment.

Exhibit 13-1 shows a screen capture of the ‘Applications and Notifications’ screen:

**Exhibit 13-1 Applications and Notifications Screen – Amendment**

The screenshot shows the 'Applications and Notifications' screen. At the top, there is a navigation bar with links for CSPP, Home, Applications and Notifications, Annual Reports, User Management, and Resources. The user is identified as 'Test User, Accreditation Body (AB) Authorized Official'. Below the navigation bar, there is a section titled 'Applications and Notifications' with a list of instructions. A table displays 5 entries found, with columns for Unique ID, Form Type, Status, Modify Date, Submission Date, Copy of Record, and Actions. The table contains the following data:

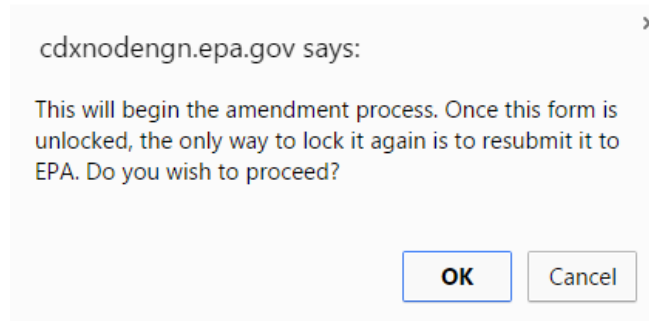
Unique ID	Form Type	Status	Modify Date	Submission Date	Copy of Record	Actions
AB-FC-39	Accreditation Body Failure to Comply Notification	Submitted	01/03/2017	01/03/2017		
AB-APP-1	Accreditation Body Application for Recognition Agreement	In Progress	01/03/2017			
AB-FC-30	Accreditation Body Failure to Comply Notification	In Progress	01/03/2017			
AB-FC-53	Accreditation Body Failure to Comply Notification	In Progress	01/03/2017			
AB-FC-62	Accreditation Body Failure to Comply Notification	In Progress	01/03/2017			

Below the table, there are export options (CSV, Excel, XML, PDF), a 'Select Form Type' dropdown menu, and a 'Start New Form' button.

**Navigation:** After clicking the ‘Lock’ icon (🔒), a prompt will display to confirm the amendment process. If you do not want to continue with the amendment, click the ‘Cancel’ button to cancel the amendment process and return to the ‘Applications and Notifications’ or ‘Annual Reports’ screen. Click the ‘OK’ button to close the prompt and continue with the amendment.

Exhibit 13-2 shows a screen capture of the ‘Unlock Prompt’ message:

**Exhibit 13-2 Unlock Prompt Message**



Click the 'OK' button to navigate to the 'Enter Passphrase' screen and then the 'Amendment' screen for the specific TSCA Title VI form.

After a submission has been unlocked, the 'Applications and Notifications' screen will display a status of 'In Progress' under the 'Status' column; however, you will not see these changes until you navigate back to the 'Applications and Notifications' screen.

- Refer to **Section 4.2** for instructions on amending an Accreditation Body Application for Recognition Agreement.
- Refer to **Section 5.1** for instructions on amending a Failure to Comply Notification – Third-Party Certifier form.
- Refer to **Section 5.2** for instructions on amending a Failure to Comply Notification – Laboratory form.
- Refer to **Section 6.1** for instructions on amending a Product AB Annual Report.
- Refer to **Section 6.2** for instructions on amending a Laboratory AB Annual Report.



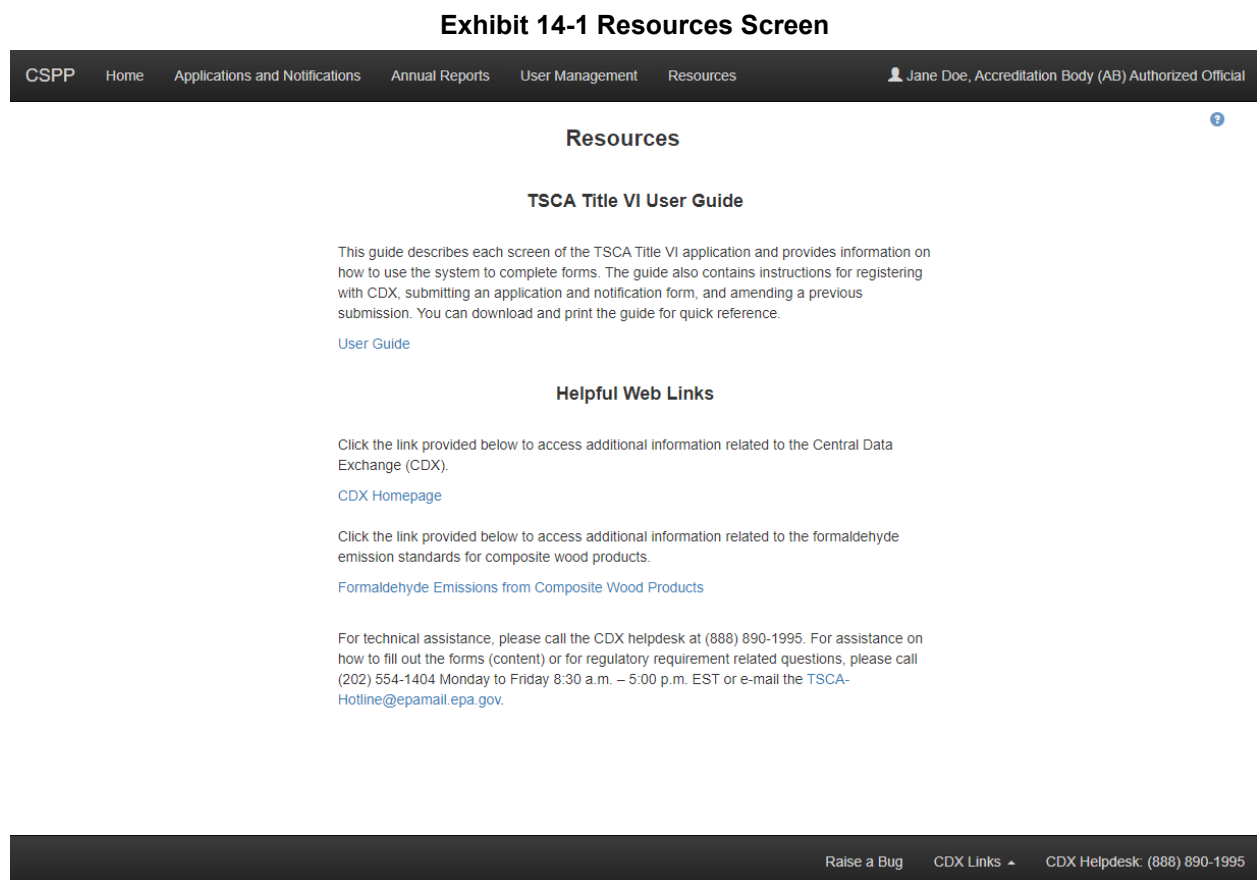
## 14 Resources

You can access the ‘Resources’ screen by clicking the ‘Resources’ link located at the top of the screen at any time during the submission process. You can also access the ‘Resources’ screen by clicking the ‘Resources’ link from the TSCA Title VI ‘Home’ screen. The ‘Resources’ screen provides you with links to the appropriate TSCA Title VI user guides as well as additional helpful links.

- **User Guide:** Click the ‘User Guide’ link to access the TSCA Title VI user guide document.
- **CDX Homepage:** Click the ‘CDX Homepage’ link to access additional information related to the Central Data Exchange (CDX).
- **Formaldehyde Emissions from Composite Wood Products:** Click the ‘Formaldehyde Emissions from Composite Wood Products’ link to access additional information related to the formaldehyde emission standards for composite wood products.

Exhibit 14-1 shows a screen capture of the ‘Resources’ screen:

**Exhibit 14-1 Resources Screen**



**Resources**

**TSCA Title VI User Guide**

This guide describes each screen of the TSCA Title VI application and provides information on how to use the system to complete forms. The guide also contains instructions for registering with CDX, submitting an application and notification form, and amending a previous submission. You can download and print the guide for quick reference.

[User Guide](#)

**Helpful Web Links**

Click the link provided below to access additional information related to the Central Data Exchange (CDX).

[CDX Homepage](#)

Click the link provided below to access additional information related to the formaldehyde emission standards for composite wood products.

[Formaldehyde Emissions from Composite Wood Products](#)

For technical assistance, please call the CDX helpdesk at (888) 890-1995. For assistance on how to fill out the forms (content) or for regulatory requirement related questions, please call (202) 554-1404 Monday to Friday 8:30 a.m. – 5:00 p.m. EST or e-mail the [TSCA-Hotline@epamail.epa.gov](mailto:TSCA-Hotline@epamail.epa.gov).

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## Appendix A

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

### Acronyms and Abbreviations

Acronym	Full Name
AB	Accreditation Body
AO	Authorized Official
CBI	Confidential Business Information
CDX	Central Data Exchange
CROMERR	Cross-Media Electronic Reporting Regulation
CSPP	Chemical Safety and Pesticide Programs
CSV	Comma-Separated Values
EPA	Environmental Protection Agency
EST	Eastern Standard Time
IAF MLA	International Accreditation Forum Multilateral Recognition Arrangement
ID	Identification
IE	Internet Explorer
ILAC MRA	International Laboratory Accreditation Cooperation Mutual Recognition Arrangement
OPPT	Office of Pollution Prevention and Toxics
PDF	Portable Document Format
TPC	Third Party Certifier
TSCA	Toxic Substances Control Act
URL	Uniform Resource Locator
XML	Extensible Markup Language