



## Section 8(a) PAIR User Guide – Primary Support

Environmental Protection Agency

Office of Pollution Prevention and Toxics

Manage Toxic Substances

OMB Control No. 2070-NEW  
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### Paperwork Reduction Act Notice

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-NEW; EPA ICR No. 2701.01; Expiration Date: 1/31/2023). The annual public reporting and recordkeeping burden for this collection of information is estimated to average 50 hours per response. Burden is defined in 5 CFR 1320.3(b). Responses to this collection of information are mandatory (40 CFR 712 and 766). 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.

## 1 Introduction

This document presents the user guide for the Office of Pollution Prevention and Toxics' (OPPT) Section 8(a) Preliminary Assessment Information Rule (PAIR) Reporting application. This document is the user guide for the Primary Support user of the Section 8(a) PAIR Reporting tool.

As a Primary Support, you can edit a form created by your Primary AO. You are only able to access submissions to which your Primary AO has granted you access

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

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

For questions concerning the TSCA Section 8(a) PAIR 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 8am – 6pm Eastern Standard Time (EST). For TSCA Section 8(a) PAIR reporting requirements, please contact the TSCA Hotline at [TSCA-Hotline@epamail.epa.gov](mailto:TSCA-Hotline@epamail.epa.gov) or call 202-554-1404.

### 1.1 Labeling Confidential Information

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

This TSCA Section 8(a) PAIR electronic application is optional for the production and submission of these filings. The paper option for filing will continue to be allowed.

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

Please note that certain CBI claims will not be accepted if you choose to use this electronic application for TSCA Section 8(a). For example, chemical name and/or chemical identity, if the chemical is listed on the public portion of the TSCA Inventory, may not be claimed as CBI in a submission using this application. Similarly, the user must enter a non-confidential study title, because it may not be claimed as CBI. EPA does not expect that such information, if evaluated under procedures at 40 CFR part 2, subpart B, would generally be found entitled to confidential treatment.

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

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

- Technical Contact Information
- Submitting on Behalf of Company information
- Plant Site Physical Location information
- Mailing Address information
- Information regarding plant site activities:
  - Manufacture of the Chemical information
  - On-Site Use as a Reactant information
  - On-Site Nonreactant Use of the Chemical Substance information
  - On-Site Preparation of Products information
  - Manufacturer’s Products information
- Information regarding the chemical substance processing by customer information
  - Customer Uses and Products information
  - Customer Process Categories information

Any document uploaded with the 40 CFR 766 flow

## 2 System Requirements

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

- An e-mail account
- A supported web browser (see Section **Error! Reference source not found.** below) with Java Script enabled Internet access.
- Internet access
- Adobe Acrobat Reader 5.0 or higher
- CDX username and password

### 2.1 Supported Browsers

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

### 2.2 Screen Resolution

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

## 3 Primary Support Functions

This section describes how to:

- Access the Application
- Navigate the Section 8(a) PAIR Home screen
- Complete the Section 8(a) PAIR form
- Complete an Amendment

As a Primary Support, you can edit a form created by your Primary AO. You are only able to access submissions to which your Primary AO has granted you access.

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

### 3.1 Log into Section 8(a) PAIR Reporting Application

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After you create an account in CDX and click the 'CSPP: Primary Support' link, you will be taken to the main 'Chemical Information Submission System' screen.

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

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

## Exhibit 3-1: Chemical Information Submission System Screen



### CHEMICAL INFORMATION SUBMISSION SYSTEM

TSCA Section 8(a) PAIR Reporting

OK

The software includes embedded help files and downloadable user manual to guide you through the 8(a) PAIR submission process.

TSCA 8(a) gives EPA the broad authority to require, by rulemaking, manufacturers (includes importers) and processors of chemical substances to maintain records and/or report such data as EPA may reasonably require to carry out the TSCA mandates.

Section 8(a) regulations can be tailored to meet unique information needs (e.g., via chemical-specific rules) or information can be obtained via use of "model" or standardized reporting rules. One example of a model TSCA Section 8(a) reporting rule is the "Preliminary Assessment Information Rule" (or PAIR).

#### Paperwork Reduction Act Notice

The information collection requirements contained in this final rule were submitted for OMB approval under PRA, 44 U.S.C. 3501 et seq. The ICR document prepared by EPA, identified under EPA ICR No. 2412.01 and OMB control number 2070-0054, is available in the docket for the proposed rule. The ICR addresses the incremental changes to the five currently approved ICR documents that cover the existing reporting and record keeping programs that are approved under OMB control numbers 2070-0004, 2070-0012, 2070-0033, 2070-0054, and 2070-0156. 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. The amended information collection activities contained in this final rule are designed to assist the Agency in meeting its responsibility under TSCA to receive, process, and review reports, data, and other information. As such, responses to the collection of information covered by this ICR would still be mandatory, but with the final rule, respondents would be required to use the CISS reporting tool.

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

### 3.2 Home Screen Navigation

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

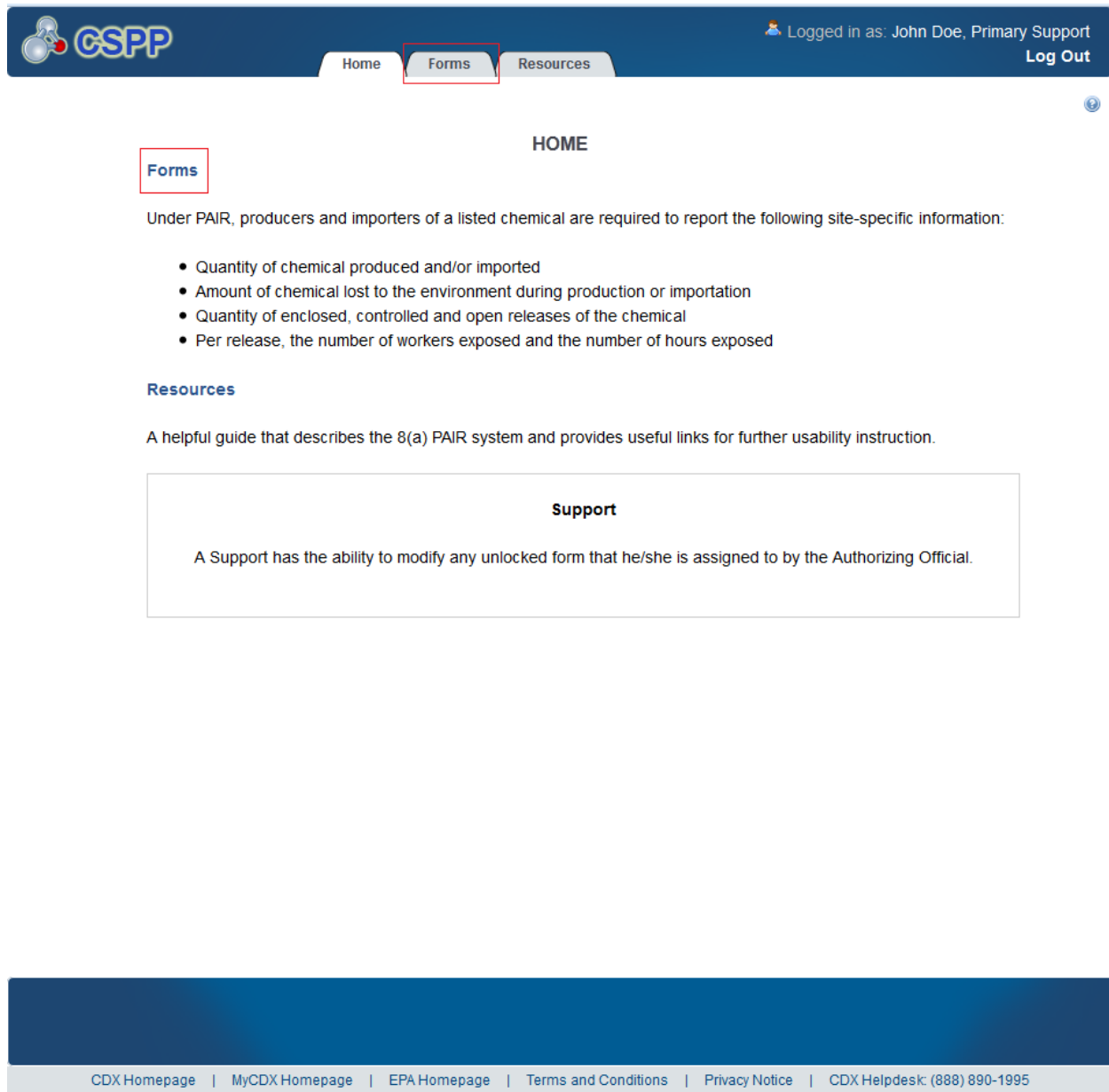


The Section 8(a) PAIR Reporting ‘Home’ screen is the first screen within the Section 8(a) PAIR Reporting application. It provides you with links and tabs to access the ‘Forms’ and ‘Resources’ screens. To navigate to any of these screens, click the screen link (located in the middle of the Section 8(a)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

- **Forms:** Click the ‘Forms’ link or tab to navigate to the ‘Section 8(a) PAIR’ forms screen. You can modify a Section 8(a) PAIR Reporting form using the ‘Section 8(a) PAIR’ forms screen. For additional details about the ‘Section 8(a) PAIR’ forms screen, please refer to **Section 3.3.1**.
- **Resources:** Click the ‘Resources’ link or tab to navigate to the ‘Resources’ screen. You can find the Section 8(a) PAIR Reporting User Guide, as well as useful links for further usability instruction on the ‘Resources’ screen. For additional details about the ‘Resources’ screen, please refer to **Section 6**.

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

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



**Navigation:** Click the ‘Forms’ link or tab to access the ‘Section 8(a) PAIR Reporting’ forms screen to edit an existing form.

### 3.3 Access New Form

As a Primary Support, you can edit a Section 8(a) PAIR Reporting form. You will be able to access only those forms for which your Primary AO has assigned you to complete.

### 3.3.1 Section 8(a) PAIR Reporting Forms Screen

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

You are only allowed to edit Section 8(a) PAIR Reporting forms to which your Primary AO has granted you access. Each column in the ‘Section 8(a) PAIR Reporting’ forms screen can be sorted by clicking the column headers.

**Edit a Submission:** To modify an existing Section 8(a) PAIR form, click the ‘Form Alias’ link for a form that has a status of ‘In Progress.’ You will be required to enter the passphrase associated with that particular form in order to access and continue editing the submission. Refer to **Section 3.3.2** for further instructions on viewing and modifying forms that are ‘In Progress.’

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

- **Form Alias:** Displays the form alias. The alias is captured on the ‘General Submission Information’ screen. The alias helps to differentiate between forms when there are multiple forms.
- **CASRN:** Displays the Chemical Abstract Services Registry Number (CASRN). The ‘CASRN’ column will display as blank until you have identified the submission type and started a new form.
- **Status:** Displays the status of the Section 8(a) PAIR form. The column will display values as either ‘In Progress’ or ‘Submitted.’
- **Modify Date:** Displays the date the form was last modified.
- **Submission Date:** Displays the date the form was submitted to CDX. This date populates only after the Primary AO has submitted the form.

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

Exhibit 3-3 shows a screen capture of the ‘Section 8(a) PAIR Reporting’ forms screen:

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

SECTION 8(a) PAIR

- To edit an **In Progress** form, click the form alias link in the **Form Alias** column in the table below.

6 items found. Page 1 of 1 Items Per Page: 25

Form Alias	CASRN	Status	Modify Date	Submission Date
<a href="#">Wed Apr 24 12:06:59 EDT 2013</a>	3772-94-9	In Progress	04/25/2013	
<a href="#">Thu Apr 25 14:09:58 EDT 2013</a>	933-75-5	In Progress	04/25/2013	
<a href="#">Mon Apr 22 09:30:54 EDT 2013</a>	2432-99-7	Submitted	04/22/2013	04/22/2013
<a href="#">Fri Apr 19 15:38:54 EDT 2013</a>	2432-99-7	In Progress	04/19/2013	
<a href="#">Fri Apr 19 15:59:59 EDT 2013</a>	2050-73-9	Submitted	04/23/2013	04/23/2013
<a href="#">Wed Apr 24 11:36:56 EDT 2013</a>	34274-30-1	In Progress	04/25/2013	

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

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

**Navigation:** Click the ‘Form Alias’ link for a form that has a status of ‘In Progress’ to navigate to the ‘Enter Passphrase’ screen.

#### 3.3.2 Enter Passphrase Screen

To edit a form click the ‘Form Alias’ link for a form with a status of ‘In Progress’ on the ‘Section 8(a) PAIR’ forms screen. The ‘Enter Passphrase’ screen allows you to enter the passphrase associated with the form.

**Enter Passphrase:** Enter the passphrase associated with the form; the passphrase for the form you have authority to edit will be given to you by your Primary AO.

Exhibit 3-4 shows a screen capture of the ‘Enter Passphrase’ screen:

### Exhibit 3-4: Enter Passphrase Screen

**ENTER PASSPHRASE**

Please enter your user passphrase and click **Next**

**Forgot Your Passphrase?**

For security reasons, the system administrator does not have access to your passphrase and cannot retrieve it or reset it to a new one. If you have forgotten your passphrase, you must complete a new Section 8(a) PAIR form and create a new passphrase for the reportable chemical substance(s) at your site.

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

**Navigation:** Enter the passphrase originally created and associated with the form by your AO and click the ‘Next’ button to navigate to the ‘General Submission Information’ screen.

#### 3.3.3 Navigation Tree

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

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

expand that section of the navigation tree. When you place your cursor over a folder title link, it will highlight in red.

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

Exhibit 3-5 shows a screen capture of the navigation prompt window:

**Exhibit 3-5: Navigation Prompt**

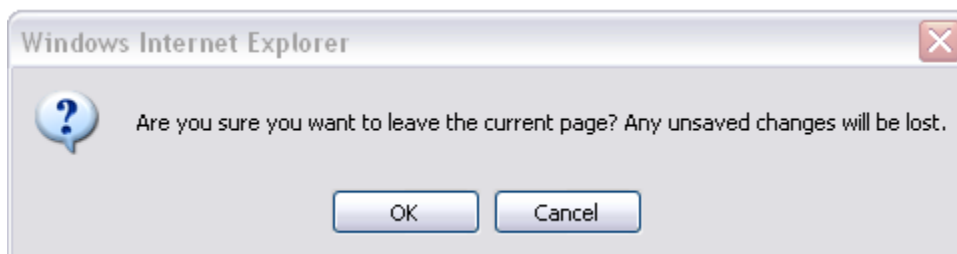
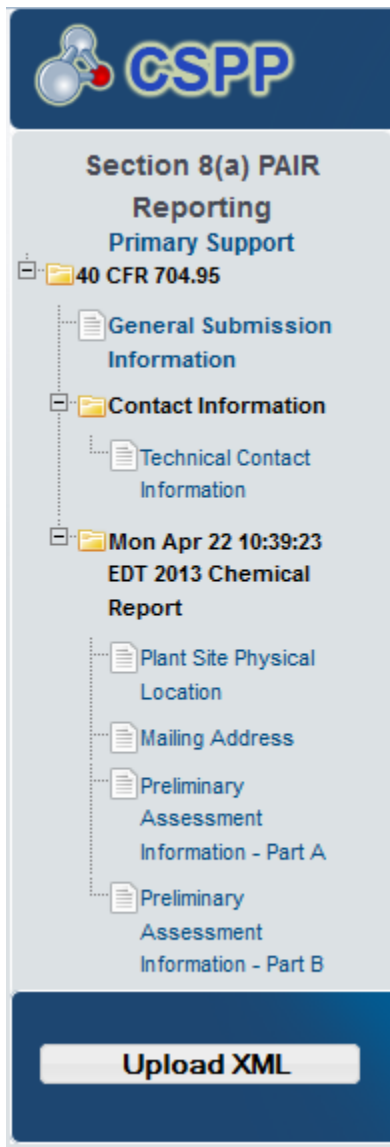


Exhibit 3-6 shows the screen capture of the navigation tree:

**Exhibit 3-6: Navigation Tree**



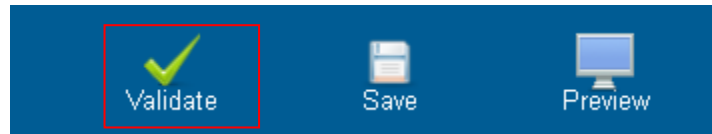
### 3.3.4 Action Bar

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

- **Validate:** You can click the ‘Validate’ icon (✓) at any stage of completing a Section 8(a) PAIR form to check for certain types of errors in a submission. A ‘Section 8(a) PAIR Validation’ pop-up window generates when you click the ‘Validate’ icon (✓). The ‘Section 8(a) PAIR Validation’ pop-up window displays a report of all validation errors relating to a failed validation. Refer to **Section Error! Reference source not found.** for more information on validating a form.

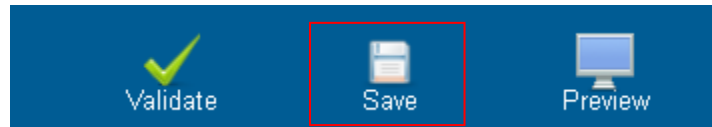
The following exhibits, Exhibit 3-7, Exhibit 3-8, Exhibit 3-9, show the screen captures for the Action Bar:

### Exhibit 3-7: Action Bar – Validate



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

### Exhibit 3-8: Action Bar – Save



- **Preview:** You can click the ‘Preview’ icon ( ) at any stage of completing a Section 8(a) PAIR Reporting form to preview the form. After you click the ‘Preview’ icon ( ), a draft watermarked PDF version of the form will generate and display in a separate window.

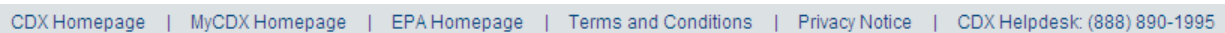
### Exhibit 3-9: Action Bar – Preview



- **Help Links:** You can click the help links at any stage of completing a Section 8(a) PAIR Reporting form.
  - If you click the ‘CDX Homepage’ link, the application navigates you to the CDX Homepage.
  - If you click the ‘MyCDX Homepage’ link, the application navigates you to the CDX Login.
  - If you click the ‘EPA Homepage’ link, the application navigates you to EPA Homepage.
  - If you click the ‘Terms and Conditions’ link, the application navigates you to the CDX Terms and Conditions screen.
  - If you click the ‘Privacy Notice’ link, the application navigates you to the CDX Privacy and Security Notice screen.

Exhibit 3-10 shows the screen capture of the Action Bar help links:

### Exhibit 3-10: Action Bar – Help Links



## 3.4 Section 8(a) PAIR

### 3.4.1 General Submission Information Screen

You can access the ‘General Submission Information’ screen by clicking the form alias from the ‘Form Alias’ and entering the passphrase created by the Primary AO.



The ‘General Submission Information’ screen allows you to select the chemical with which the form is associated by selecting it from the ‘CASRN’ drop-down menu. If the FRN has only one associated chemical, the chemical name will prepopulate the screen. The system also allows you to edit the form alias associated with the form. If you choose not to edit the form alias, the field will auto-populate with a time stamp containing the date, time, and time zone for when the form was created.

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

- **CASRN:** Displays all available chemicals associated with the Code of Federal Regulation (CFR) citation selected by your Primary AO on the ‘Section 8(a) PAIR’ forms screen. This is a required field.
- **Form Alias:** This field is auto-populated with a time stamp and displays on the ‘Section 8(a) PAIR’ form screen within the ‘Form Alias’ column. This field is editable should you choose to provide your own form alias.

Exhibit 3-11 shows the screen capture for ‘General Submission Information’ screen:

### Exhibit 3-11: General Submission Information

The screenshot shows the 'General Submission Information' screen. At the top, there is a navigation bar with 'Home', 'Forms', and 'Resources' tabs, and a user profile for 'John Doe, Primary Support' with a 'Log Out' button. A left-hand navigation tree is visible, showing a hierarchy from 'Section 8(a) PAIR Reporting' down to 'General Submission Information'. The main content area is titled 'GENERAL SUBMISSION INFORMATION' and contains the following text: 'You have chosen to report under **40 CFR 704.25**. Based on this selection, all data entered in this form should pertain to the following chemical, **11-Aminoundecanoic acid**.' Below this, a paragraph explains the 'Form Alias' field: 'The form alias is an optional field that changes the submission name on the **Forms Screen**. Its purpose is to make it easier to distinguish between multiple submissions. If an alias is not selected, the field will default to the date and time it was created. The form alias may be changed at any time.' A 'Form Alias' field is shown with the value 'Mon Sep 23 11:36:07 EDT 2013' and a 'Next' button. At the bottom, there is a blue bar with 'Upload XML' and 'Validate', 'Save', and 'Preview' buttons. A footer contains links to 'CDX Homepage', 'MyCDX Homepage', 'EPA Homepage', 'Terms and Conditions', 'Privacy Notice', and 'CDX Helpdesk: (888) 890-1995'.

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

### 3.4.2 Technical Contact Information Screen

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

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

- **This is a submission on behalf of another company:** Checking the ‘This is a submission on behalf of another company’ checkbox allows you to identify yourself as an individual submitting on behalf of another company.
- **Copy CDX Registration:** Clicking the ‘Copy CDX Registration’ button will allow the system to automatically populate the fields with your contact information provided during CDX registration.
- **Prefix:** The ‘Prefix’ drop-down menu displays all optional prefixes and captures the technical contact’s prefix. If you clicked the ‘Copy CDX Registration’ button, the fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration.
- **First Name:** Captures the technical contact’s first name. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Middle Initial:** Displays the technical contact’s middle initial. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration.
- **Last Name:** Displays the technical contact’s last name. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Suffix:** The ‘Suffix’ drop-down menu displays all optional suffixes and captures the technical contact’s suffix. If you clicked the ‘Copy CDX Registration’ button, the fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration.
- **Company Name:** Captures the technical contact’s company name. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Phone Number:** Captures the technical contact’s daytime telephone number; U.S. or international. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.

- **Email Address:** Captures the technical contact’s email address. The email address must follow the standard email address format: john.doe@abc.com. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Mailing Address 1:** Captures the first line of the technical contact’s mailing address. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Mailing Address 2:** Captures the second line of the technical contact’s mailing address. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration.
- **City:** Captures the city of the technical contact’s mailing address. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **State:** Displays all available states and captures the state of the technical contact’s mailing address. If you clicked the ‘Copy CDX Registration’ button, the fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field if the ‘Country’ field is defined as ‘United States.’
- **Postal Code:** Captures the postal code of the technical contact’s mailing address. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Country:** Displays all available countries and captures the country of the technical contact’s mailing address. If you clicked the ‘Copy CDX Registration’ button, the fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.

Exhibit 3-12 shows the screen capture of the ‘Technical Contact Information’ screen:

### Exhibit 3-12: Technical Contact Information Screen

**Section 8(a) PAIR Reporting Primary Support**  
 40 CFR 704.25

- General Submission Information
- Contact Information**
  - Technical Contact Information**
  - Submitting On Behalf Of Company
- Chemical Information
  - Plant Site Physical Location
  - Mailing Address
  - Preliminary Assessment Information - Part A
  - Preliminary Assessment Information - Part B

Section 8(a) PAIR Reporting > 40 CFR 704.25 > Contact Information > Technical Contact Information

#### TECHNICAL CONTACT INFORMATION

Identify the technical contact who is capable of answering questions related to the chemical(s) submitted to EPA within this form. Identify if this submission is being submitted on behalf of another company by checking the checkbox. Click the Copy button below to import your CDX registration contact information.

This is a submission on behalf of another company:

**Copy CDX Registration**

CBI:

Prefix:

First Name:

Middle Initial:

Last Name:

Suffix:

Company Name:

Phone Number:  Ext:   
(Do not enter any dashes (-) in Phone Number field above.)

Email Address:

Mailing Address 1:   
Street address, P.O. box, company name, etc.

Mailing Address 2:   
Apartment, suite, etc.

City:

State:

Postal Code:

Country:

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**Navigation:** Click the ‘Next’ button to navigate to the ‘Plant Site Physical Location’ screen. If you checked the ‘Submitting on behalf of company’ checkbox on the ‘General Submission Information’ screen, you are taken to the ‘Submitting on Behalf of Company’ screen.

#### 3.4.3 Submitting on Behalf of Company Screen

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

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

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

Exhibit 3-13 shows the screen capture of the ‘Submitting on Behalf of Company’ screen:

### Exhibit 3-13: Submitting on Behalf of Company Screen

**Section 8(a) PAIR Reporting**  
Primary Support  
40 CFR 704.25

Section 8(a) PAIR Reporting > Contact Information > Submitting On Behalf Of Company

### SUBMITTING ON BEHALF OF COMPANY

Please fill out the fields below for the manufacturing or processing establishment on whose behalf this submission is being made.

CBI:

Prefix:

First Name:

Middle Initial:

Last Name:

Suffix:

Company Name:

Phone Number:  Ext:   
(Do not enter any dashes (-) in Phone Number field above.)

Email Address:

Mailing Address 1:   
Street address, P.O. box, company name, etc.

Mailing Address 2:   
Apartment, suite, etc.

City:

State:

Postal Code:

Country:

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**Navigation:** Click the ‘Next’ button to navigate to the ‘Plant Site Physical Location’ screen.

#### 3.4.4 Plant Site Physical Location Screen

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

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

- **CBI:** The system allows you to claim the plant site information as CBI by checking the 'CBI' checkbox. Validation will ensure equivalency between plant site and parent company CBI claims. If you claim the plant site information as CBI, but do not claim the parent company information as CBI, the system will display an error message indicating that both the plant site information and the parent company information must have the same CBI claims.
- **Plant Site:** The 'Plant Site' drop-down menu allows you to choose the correct facility for the reported chemical location. The 'Plant Site' drop-down menu values are pre-populated from CDX based on the facilities your Primary AO added under 'Manage Facilities' in CDX. If the facilities have been updated in CDX, the drop-down menu will be re-validated and updated. The 'Company,' 'Address 1,' 'Address 2,' 'Email,' 'Phone Number,' 'City,' 'State,' and 'Postal Code' fields will populate once a 'Plant Site' facility is selected from the drop-down menu.
- **Dun & Bradstreet:** The system requires you to enter the Dun & Bradstreet number within the 'Dun & Bradstreet' text field. The 'Dun & Bradstreet' text field is validated for the appropriate Dun & Bradstreet format. The Dun & Bradstreet number consists of a 9-digit number in the xx-xxx-xxxx format.

Exhibit 3-14 shows the screen capture of the 'Plant Site Physical Location' screen:

### Exhibit 3-14: Plant Site Physical Location Screen

**Section 8(a) PAIR Reporting Primary Support**  
 40 CFR 704.25

General Submission Information

Contact Information

- Technical Contact Information
- Submitting On Behalf Of Company

Chemical Information

- Plant Site Physical Location**
- Mailing Address
- Preliminary Assessment Information - Part A
- Preliminary Assessment Information - Part B

Section 8(a) PAIR Reporting > Chemical Information > Plant Site Physical Location

#### PLANT SITE PHYSICAL LOCATION

Enter the name, physical location address, and Dun & Bradstreet Number of the plant site for which the data are reported.

CBI:

Plant Site:

Company:

Address 1:

Address 2:

City:

State:

Postal Code:

Dun & Bradstreet:

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**Navigation:** Click the ‘Next’ button to navigate to the ‘Mailing Address’ screen.

#### 3.4.5 Mailing Address Screen

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

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



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

- **Plant Site:** Selecting the 'Plant Site' radio button option identifies that the plant site is submitting the Section 8(a) PAIR form. If you select this radio button option, the 'Copy' radio button will display. If the mailing address of the plant site is the same as the plant site physical location, you can click the 'Copy' button to populate the information entered on the 'Plant Site Physical Location' screen.
- **Corporate Headquarters:** Selecting the 'Corporate Headquarters' radio button option identifies that the corporate headquarters is submitting the Section 8(a) PAIR form. If you select this radio button option, the 'Dun & Bradstreet' text field is displayed and is required.
- **CBI:** The CBI checkbox allows you to claim the information entered on the 'Mailing Address' screen as CBI. If you check the CBI checkbox, the 'Plant Site Physical Location' screen must also be claimed as CBI.
- **Copy:** The 'Copy' button displays when you select the 'Plant Site' radio button and it allows you to populate the information entered on the 'Plant Site Physical Location' screen to the 'Mailing Address' screen.
- **Company:** Captures the company name of the plant site or corporate headquarters. This field is required.
- **Mailing Address 1:** Captures the first line of the plant site or corporate headquarters mailing address. This field is required.
- **Mailing Address 2:** Captures the second line of the plant site or corporate headquarters mailing address.
- **City:** Captures the city of the plant site or corporate headquarters address. This field is required.
- **State:** Displays all available captures the state of the plant site or corporate headquarters address. This field is required.
- **Postal Code:** Captures the postal code of the plant site or corporate headquarters address. The postal code field will not validate what is entered to correspond with the correct address. Postal code validation only ensures that the correct format is entered. This field is required.
- **Dun & Bradstreet:** The 'Dun & Bradstreet' field displays when you select the 'Corporate Headquarters' radio button and it captures the Dun & Bradstreet number of the corporate headquarters. The system has built-in validation to validate that the Dun & Bradstreet number is entered using the correct Dun & Bradstreet number format. This field is required.

Exhibit 3-15 shows the screen capture for the ‘Mailing Address’ screen:

**Exhibit 3-15: User Mailing Address Screen**

**Section 8(a) PAIR Reporting**  
 Primary Support  
 40 CFR 704.25

General Submission Information  
 Contact Information  
 Technical Contact Information  
 Submitting On Behalf Of Company  
 Chemical Information  
 Plant Site Physical Location  
**Mailing Address**  
 Preliminary Assessment Information - Part A  
 Preliminary Assessment Information - Part B

Section 8(a) PAIR Reporting > Chemical Information > Mailing Address

### MAILING ADDRESS

Select the appropriate radio button to show whether the plant site or corporate headquarters is submitting this form. Enter the corresponding name and mailing address. Click the Copy button to import information from the Plant Site Physical Location.

Plant Site  
 Corporate Headquarters

CBI:

Company:

Address 1:   
Street address, P.O. box, company name, etc.

Address 2:   
Apartment, suite, etc.

City:

State:

Postal Code:

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

### 3.4.6 Preliminary Assessment Information-Part A Screen

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

The system provides you the ability to upload an XML document to fulfill Section 8(a) PAIR reporting requirements. The system will validate all data pulled from the XML document. Refer to **Section 3.4.8** for additional information.

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

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

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

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

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

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

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

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

- **6. On-Site Nonreactant Use of the Chemical Substance:** This is the quantity of the chemical substance used on site. Examples include cleaning solvents, dielectric fluids, emulsifiers, and lubricants.
- **7. On-Site Preparation of Products:** This is the quantity of the chemical substance processed at the manufacturing site into products for onsite use or sale. All steps up to and including incorporation of the chemical into an article is required for reporting.

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

- **Enclosed:** Enclosed processes are designed and operated to prevent intentional release of the chemical.
- **Controlled Release:** Controlled release processes are operated in a controlled manner to minimize the release of the chemical into the workplace.
- **Open:** Open process chemicals are routinely in direct contact with the atmosphere and no measures are taken to prevent release.

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

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

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

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

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

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

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

The following exhibits, Exhibit 3-16 and Exhibit 3-17, show the screen captures for the Preliminary Assessment Information – Part A:

## Exhibit 3-16: Preliminary Assessment Information – Part A Screen Scroll 1

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Primary Support

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- General Submission Information
- Contact Information**
  - Technical Contact Information
  - Submitting On Behalf Of Company
- Chemical Information**
  - Plant Site Physical Location
  - Mailing Address
  - Preliminary Assessment Information - Part A**
  - Preliminary Assessment Information - Part B

Section 8(a) PAIR Reporting > Chemical Information > Preliminary Assessment Information - Part A

### PRELIMINARY ASSESSMENT INFORMATION

#### Part A - Plant Site Activities

Please complete all fields below. Information in part A must be your best estimate from readily obtainable data.

This company is not involved in any manufacturing activity and imports a chemical at one site and processes it at another facility.

				CBI
1.	Total Quantity Imported	<input type="text"/> kg		<input type="checkbox"/>
2.	Quantity manufactured for sale or use	<input type="text"/> kg		<input type="checkbox"/>
3a.	Quantity lost to the environment	<input type="text"/> kg	± <input type="text"/> %	<input type="checkbox"/>
3b.	Quantity in wastes treated to destroy the chemical	<input type="text"/> kg	± <input type="text"/> %	<input type="checkbox"/>
3c.	Quantity in wastes not treated to destroy the chemical	<input type="text"/> kg	± <input type="text"/> %	<input type="checkbox"/>
3d.	Quantity lost during manufacture	<input type="text"/> kg		<input type="checkbox"/>

**4. Manufacture of the Chemical** CBI:

Process Category	Quantity (kg)	Total Quantity (kg)	Total Workers	Total Worker-Hours
Enclosed	<input type="text"/>		<input type="text"/>	<input type="text"/>
Controlled Release	<input type="text"/>		<input type="text"/>	<input type="text"/>
Open	<input type="text"/>		<input type="text"/>	<input type="text"/>

**5. On-Site Use as a Reactant** CBI:

Process Category	Quantity (kg)	Total Quantity (kg)	Total Workers	Total Worker-Hours
Enclosed	<input type="text"/>		<input type="text"/>	<input type="text"/>
Controlled Release	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Open	<input type="text"/>		<input type="text"/>	<input type="text"/>

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### Exhibit 3-17: Preliminary Assessment Information – Part A Screen Scroll 2

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General Submission Information

Contact Information

Technical Contact Information

Submitting On Behalf Of Company

Chemical Information

Plant Site Physical Location

Mailing Address

Preliminary Assessment Information - Part A

Preliminary Assessment Information - Part B

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Controlled Release Open

5. On-Site Use as a Reactant CBI:

Process Category	Quantity (kg)	Total Quantity (kg)	Total Workers	Total Worker-Hours
Enclosed	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Controlled Release	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Open	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

6. On-Site Nonreactant Use of the Chemical Substance CBI:

Process Category	Quantity (kg)	Total Quantity (kg)	Total Workers	Total Worker-Hours
Enclosed	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Controlled Release	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Open	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

7. On-Site Preparation of Products CBI:

Process Category	Quantity (kg)	Total Quantity (kg)	Total Workers	Total Worker-Hours
Enclosed	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Controlled Release	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Open	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

8. Manufacturer's Products CBI:

a. Products for Export  kg

Domestic Industrial Products		Domestic Consumer Products	
Chemical or Mixture	b. <input type="text"/> kg	e. <input type="text"/> kg	
Article with Some Release	c. <input type="text"/> kg	f. <input type="text"/> kg	
Article with No Release	d. <input type="text"/> kg	g. <input type="text"/> kg	

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

#### 3.4.7 Preliminary Assessment Information- Part B Screen

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

The system provides the ability to upload an XML document to fulfill Section 8(a) PAIR reporting requirements. The system will validate all data pulled from the XML document. Refer to **Section 3.4.8** for additional information.

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

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

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

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

- **10. Market Names:** The 'Market Names' section allows you to list each market to which the chemical was distributed within a table. Market names are entered in the text field under the 'Name' column. To add additional market names, click the plus symbol within the 'Actions' column. This allows EPA to gather information about the chemical uses reported as 'unknown' by requiring processors of the products to report directly to the Agency.
- **11. Customer Process Categories:** Item '11. Customer Process Categories' will be displayed as '10. Customer Process Categories' if you did not report more than 20% of the total quantity of the chemical substances entered within items '1. Total Quantity Imported' and '2. Quantity manufactured for sale or use' as unknown in item 9i. The 'Customer Process Categories' addresses the user's general knowledge of the process types customers use to process the chemical. The system will allow you to enter the word 'unknown' if you cannot estimate within +/-50%.

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



**Error! Reference source not found.** Exhibit 3-18 shows the screen capture of the ‘Preliminary Assessment Information – Part B:

**Exhibit 3-18: Preliminary Assessment Information-Part B Screen**

**Section 8(a) PAIR Reporting Primary Support**  
 40 CFR 704.25

General Submission Information

Contact Information

Technical Contact Information

Submitting On Behalf Of Company

Chemical Information

Plant Site Physical Location

Mailing Address

Preliminary Assessment Information - Part A

**Preliminary Assessment Information - Part B**

Section 8(a) PAIR Reporting > Chemical Information > Preliminary Assessment Information - Part B

**PRELIMINARY ASSESSMENT INFORMATION**

**Part B - Chemical Substance Processing by Customers**

Please complete all fields below. Information in part B must be accurate to within ±50%.

**9. Customer Uses and Products** CBI:

a. Products for Export  kg

b. Quantity of Chemical Consumed as Reactant  kg

	Domestic Industrial Products	Domestic Consumer Products
Chemical or Mixture	c. <input type="text"/> kg	f. <input type="text"/> kg
Article with Some Release	d. <input type="text"/> kg	g. <input type="text"/> kg
Article with No Release	e. <input type="text"/> kg	h. <input type="text"/> kg

Specify Unknown if you do not know within ±50%

i. Unknown Customer Uses  kg

**10. Customer Process Categories** CBI:

Specify Unknown if you do not know within ±50%

a. Enclosed Processes  kg

b. Controlled Release Processes  kg

c. Open Processes  kg

d. Unknown  kg

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**Navigation:** Answer all of the questions and click the ‘Validate’ button to navigate to the ‘Section 8(a) PAIR Validation’ pop-up window.

### 3.4.8 Upload XML

This section presents the instructions for uploading an XML document. The system provides the ability for the user to upload an XML document to fulfill the reporting requirements for the

‘Preliminary Assessment Information – Part A’ and the ‘Preliminary Assessment Information – Part B’ screens. The system will validate all data pulled from the XML document.

#### 3.4.8.1 Upload XML Screen

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

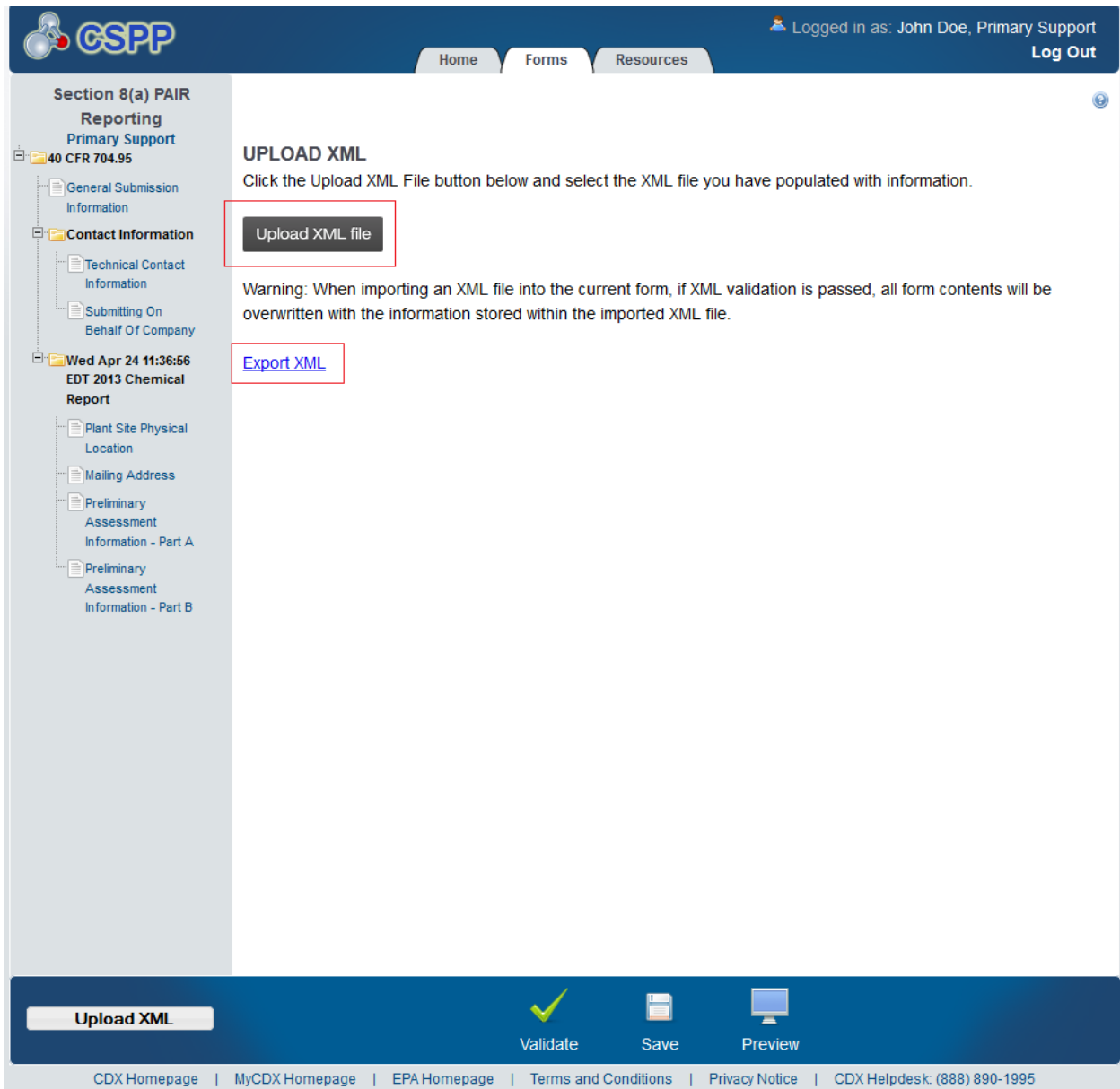
The ‘Upload XML’ screen allows you to upload the necessary XML document that will fulfill the reporting requirements for both the ‘Preliminary Assessment Information – Part A’ and the ‘Preliminary Assessment Information – Part B’ screens. If previous information has been entered, the data will be over written if the XML includes new information regarding already completed sections.

The following fields are displayed on the ‘Upload XML’ screen:

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

Exhibit 3-19 shows the screen capture for the ‘Upload XML’ screen:

**Exhibit 3-19: Upload XML Screen**



**Navigation:** Click the ‘Upload XML file’ button to generate a browse pop-up window. Click the ‘Export XML’ link to view or save the uploaded XML document to your computer. Click any link within the navigation tree to leave the ‘Upload XML’ screen.

### 3.5 40 CFR 766

This section presents user guide instructions for the 40 CFR 766 Dibenzodioxins/Dibenzofurans flow of the Section 8(a) PAIR application. Each submission will have a one to one (1:1) ratio between the chemical and the form submitted to EPA.

### 3.5.1 General Submission Information Screen

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You can access the ‘General Submission Information’ screen by clicking a form alias link from the ‘Form Alias’ column and entering the passphrase provided by your Primary AO on the ‘Enter Passphrase’ screen.

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

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

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

Exhibit 3-20 shows the screen capture for ‘General Submission Information’ screen:

### Exhibit 3-20: General Submission Information Screen

The screenshot displays the 'General Submission Information' screen. At the top, the GSPPP logo is on the left, and the user is logged in as 'John Doe, Primary Support' with a 'Log Out' link on the right. Below the logo are 'Home', 'Forms', and 'Resources' tabs. The left navigation pane shows a tree structure under '40 CFR 766: Section 8(a) PAIR Reporting Primary Support', with 'General Submission Information' highlighted. The main content area has a breadcrumb trail: 'Section 8(a) PAIR Reporting > 40 CFR 766> General Submission Information'. The title is 'GENERAL SUBMISSION INFORMATION'. The text reads: 'You have chosen to report under **40 CFR 766**. Based on this selection, all data entered in this form should pertain to the following chemical selected from the drop-down menu below. Please select, or begin typing, a CASRN in the drop-down menu below:'. Below this is a 'CASRN:' label and a dropdown menu. Further down, it says: 'The form alias is an optional field that changes the submission name on the **Forms Screen**. Its purpose is to make it easier to distinguish between multiple submissions. If an alias is not selected, the field will default to the date and time it was created. The form alias may be changed at any time.' Below this is a 'Form Alias:' label and a text input field containing 'Mon Sep 23 11:42:29 EDT 2013'. A 'Next' button is centered below the form alias field. At the bottom of the page, there are three buttons: 'Validate' (with a green checkmark icon), 'Save' (with a floppy disk icon), and 'Preview' (with a monitor icon). The footer contains links: 'CDX Homepage | MyCDX Homepage | EPA Homepage | Terms and Conditions | Privacy Notice | CDX Helpdesk: (888) 890-1995'.

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

### 3.5.2 Technical Contact Information Screen

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

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

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

- **Copy CDX Registration:** Clicking the ‘Copy CDX Registration’ button will allow the system to automatically populate the fields with your contact information provided during CDX registration.
- **CBI:** Checking the ‘CBI’ checkbox allows you to claim contact information as CBI.
- **Prefix:** The ‘Prefix’ drop-down menu displays all optional prefixes and captures the technical contact’s prefix. If you clicked the ‘Copy CDX Registration’ button, the fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration.
- **First Name:** Captures the technical contact’s first name. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Middle Initial:** Captures the technical contact’s middle initial. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration.
- **Last Name:** Captures the technical contact’s last name. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Suffix:** The ‘Suffix’ drop-down menu displays all optional suffixes and captures the technical contact’s suffix. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration.
- **Company Name:** Captures the technical contact’s company name. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Phone Number:** Captures the technical contact’s daytime telephone number; U.S. or international. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Email Address:** Captures the technical contact’s email address. The email address must follow the standard email address format: john.doe@abc.com. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Mailing Address 1:** Captures the first line of the technical contact’s mailing address. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.
- **Mailing Address 2:** Captures the second line of the technical contact’s mailing address. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration.
- **City:** Captures the city of the technical contact’s mailing address. If you clicked the ‘Copy CDX Registration’ button, the text fields on the ‘Technical Contact Information’ screen populate with information entered during CDX registration. This is a required field.

- **State:** Displays all available states and captures the state of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field if the 'Country' field is defined as 'United States.'
- **Postal Code:** Captures the postal code of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the text fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.
- **Country:** Displays all available countries and captures the country of the technical contact's mailing address. If you clicked the 'Copy CDX Registration' button, the fields on the 'Technical Contact Information' screen populate with information entered during CDX registration. This is a required field.

Exhibit 3-21 shows the ‘Technical Contact Information’ screen.

### Exhibit 3-21: Technical Contact Information Screen

**Navigation:** Click the ‘Next’ button to navigate to the ‘Document Management’ screen. If you checked the ‘This is a submission on behalf of another company’ checkbox, you are taken to the ‘Submitting on Behalf of Company’ screen.

#### 3.5.3 Submitting on Behalf of Company Screen

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



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

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

Exhibit 3-22 shows the screen capture of the ‘Submitting on Behalf of Company’ screen:

**Exhibit 3-22: Submitting on Behalf of Company Screen**

40 CFR 766: Section 8(a) PAIR Reporting Primary Support

40 CFR 766: Section 8(a) PAIR Reporting > Contact Information > Submitting On Behalf Of Company

### SUBMITTING ON BEHALF OF COMPANY

Please fill out the fields below for the manufacturing or processing establishment on whose behalf this submission is being made.

CBI:

Prefix:

First Name:

Middle Initial:

Last Name:

Suffix:

Company Name:

Phone Number:  Ext:   
(Do not enter any dashes (-) in Phone Number field above.)

Email Address:

Mailing Address 1:   
Street address, P.O. box, company name, etc.

Mailing Address 2:   
Apartment, suite, etc.

City:

State:

Postal Code:

Country:

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

**Navigation:** Click the ‘Next’ button to navigate to the ‘Document Management’ screen.

### 3.5.4 Document Management Screen

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

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

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

The following items are displayed on the 'Document Management' screen:

- **Add Document:** Clicking the 'Add Document' button initiates the 'Document Management' pop-up window.
- **File Name:** Displays the name of the attached document. Clicking the file name link for a previously attached document generates the 'Document Management' pop-up window and allows you to view and edit the attached document.
- **Attachment Date:** Displays the date the document was attached.
- **CBI:** Displays the CBI claim for the attached document as either 'Y' or 'N.'
- **Action:** Clicking the 'Delete' icon will delete the specified row and its contents. A warning message displays to confirm the deletion.

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

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

Exhibit 3-23 shows the screen capture of the ‘Document Management’ screen:

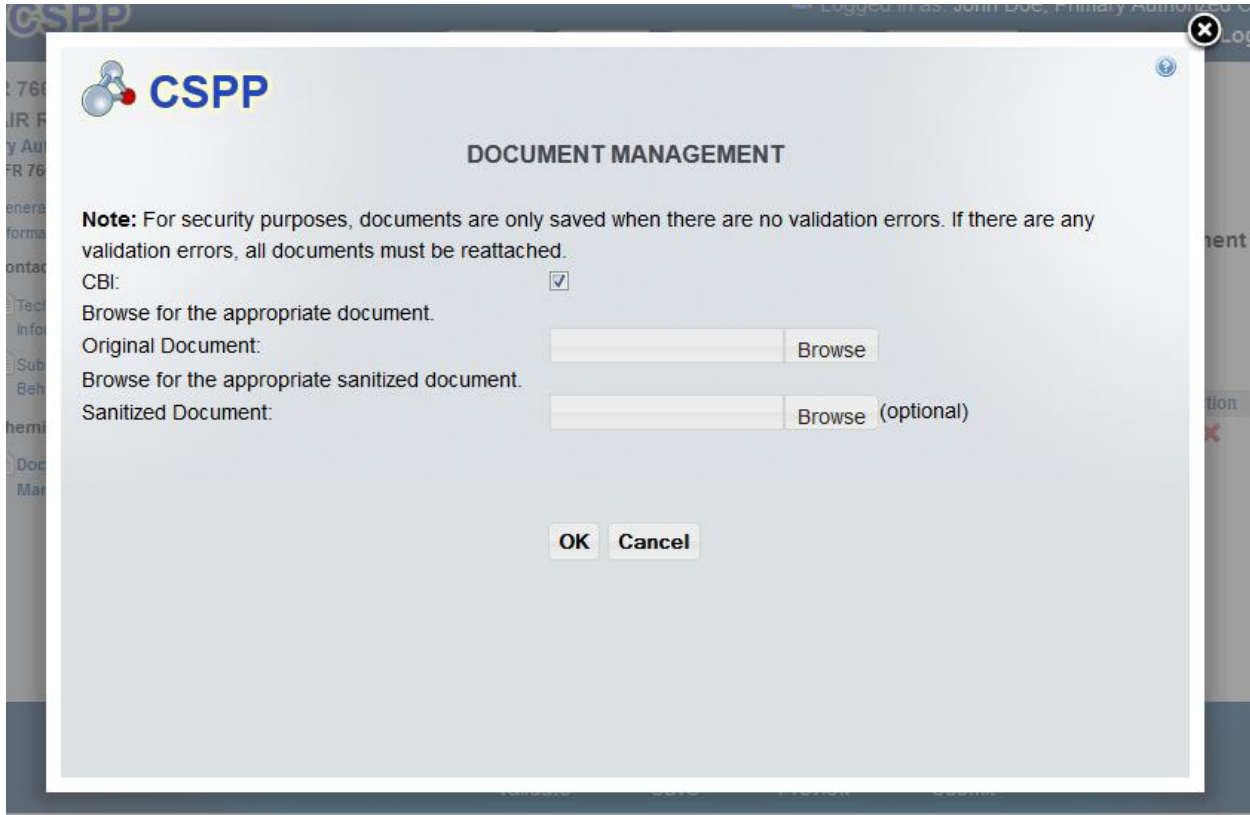
**Exhibit 3-23: Document Management Screen**

The screenshot displays the 'Document Management' interface. At the top, the user is logged in as 'John Doe, Primary Support'. The breadcrumb trail indicates the path: '40 CFR 766: Section 8(a) PAIR Reporting > Chemical Information > Document Management'. The main heading is 'DOCUMENT MANAGEMENT'. Below this, a message instructs the user to upload documents by clicking the 'Add Document' button. A table lists one attachment: 'Submit blank form.docx' with an attachment date of '06/27/2013', a 'CBI' status of 'Y', and an 'Action' of a red 'X'. A 'Previous' button is located below the table. At the bottom, there are three action buttons: 'Validate' (with a green checkmark), 'Save' (with a document icon), and 'Preview' (with a monitor icon). The footer contains links to 'CDX Homepage', 'MyCDX Homepage', 'EPA Homepage', 'Terms and Conditions', 'Privacy Notice', and 'CDX Helpdesk: (888) 890-1995'.

**Navigation:** Click the ‘Add Document’ button to initiate the ‘Document Management’ pop-up window.

Exhibit 3-24 shows the screen capture of the ‘Document Management’ pop-up window:

**Exhibit 3-24: Document Management Pop-Up Window**



## 4 Validate

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

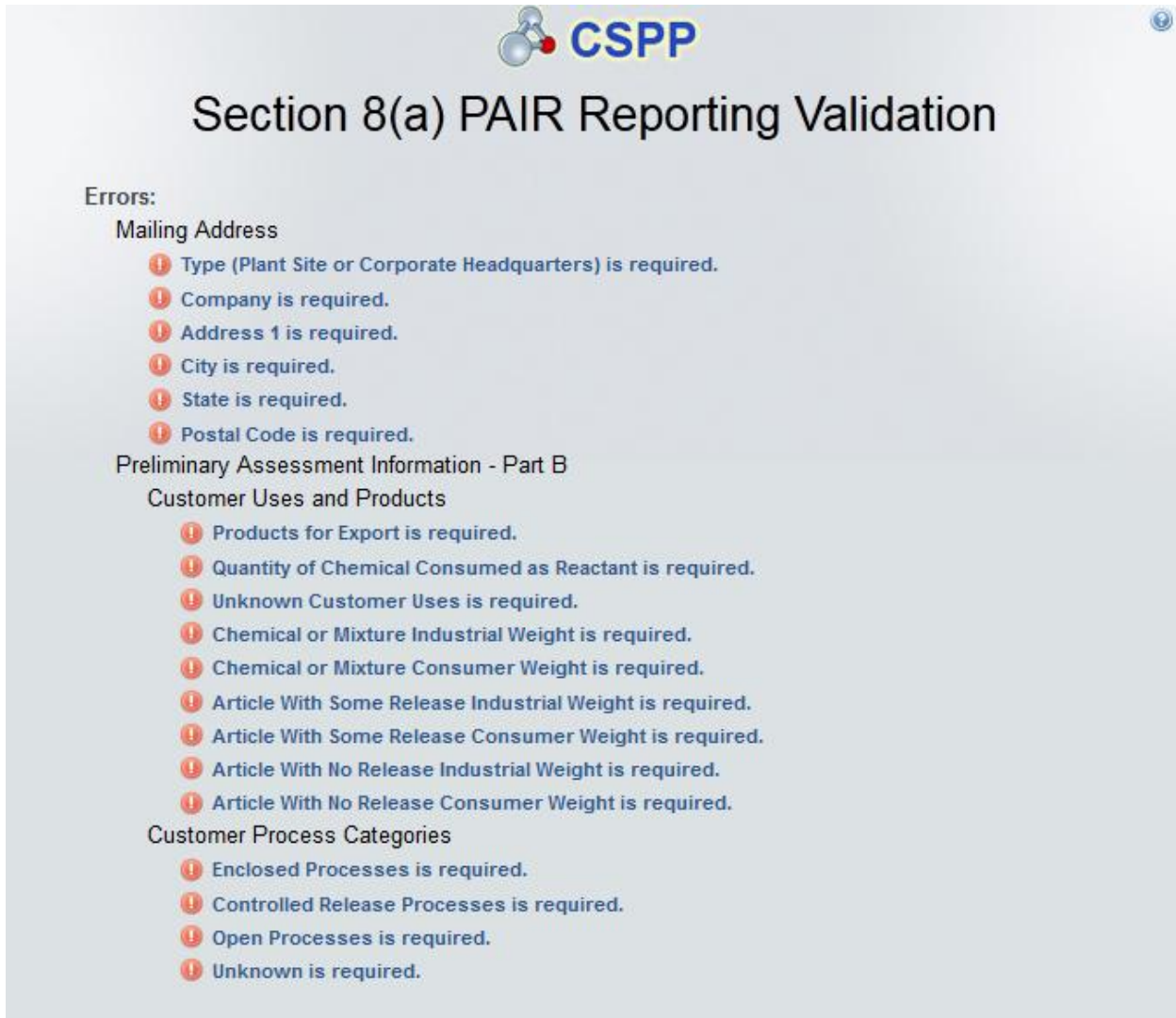
**Validation Errors:** Errors are denoted by an error icon (ⓘ) and can be fixed by clicking the error link. The links will display the *Screen Title Name* (e.g., Mailing Address) and the associated error. After you click a link, the main application screen will display the section where the error occurred so you can easily fix the error. Once you have fixed the error, click the ‘Validate’ icon (✓) again to refresh the ‘Section 8(a) PAIR Reporting Validation’ pop-up window. If the information you fixed passes validation, the error will be removed from the ‘Section 8(a) PAIR Reporting Validation’ pop-up window.

**Warning Messages:** Warnings are denoted by a warning icon (⚠) and can be fixed by clicking the warning link. The links will display the *Screen Title Name* (e.g., Mailing Address) and the associated warning. After you click a link, the main application screen will display the section where the warning occurred so you can easily fix the warning. Once you have fixed the warning, click the ‘Validate’ icon (✓) again to refresh the ‘Section 8(a) PAIR Reporting Validation’ pop-up window. If the information you fixed passes validation, the warning will be removed from the ‘Section 8(a) PAIR Reporting Validation’ pop-up window.

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

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

**Exhibit 4-1: Section 8(a) PAIR Reporting Validation Pop-Up Window**



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## 5 Complete an Amendment

Only the Primary AO can unlock a submission to create an amendment. After the AO has unlocked the submission and logged out, you (the Primary Support) can login and edit the form. At this point, the 'Section 8(a) PAIR' forms 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 'Section 8(a) PAIR' forms screen. Click the 'Form Alias' link for the form that you are amending to navigate to the 'Enter Passphrase' screen. You must enter the passphrase originally associated with the form to complete the amendment process.



## 6 Resources

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

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

Exhibit 6-1 shows the screen capture of the ‘Resources’ screen:

## Exhibit 6-1: Resources Screen

**RESOURCES**  
Section 8(a) PAIR User Guide

This guide describes each screen of the Section 8(a) PAIR software and provides information on how to use the system to complete the form. The guide also contains instructions for registering with CDX, submitting the form, and modifying a previous submission. You can download and print the Section 8(a) PAIR User Guide for quick reference.

[User Guide](#)

**Helpful Web Links**

Click the link provided below to access additional information related to Section 8(a) PAIR Reporting.  
[Section 8\(a\) PAIR Reporting Homepage](#)

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

Click the link provided below to access additional information related to the Toxic Substances Control Act (TSCA).  
[TSCA Chemical Substances Inventory](#)

If you need assistance, please call (202) 564-3011 or e-mail the TSCA Hotline at [TSCA-Hotline@epamail.epa.gov](mailto:TSCA-Hotline@epamail.epa.gov).

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

## Appendix A. Definitions, Acronyms, and Abbreviations

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

### Definitions, Acronyms, and Abbreviations

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