

Helpful Hints

Questions and Answers for the e-PMN Thin Client

US EPA

4/7/2015

Contents

A. CDX Related Questions.....	6
1. Do I need to register with CDX to submit or to work on section 5 notices?	6
2. Where do I go to register with CDX?	6
3. Can I be registered under more than one company name? What company name should I register for?	6
4. What is LexisNexis?.....	6
5. What if I do not pass ID proofing with LexisNexis? What do I have to do?.....	6
6. If I have been approved for the TSCA workflow, do I need to reregister in CDX to work in the new e-PMN under CSPP workflow?	7
7. What role should I register for in CDX?	7
8. Can I have more than one role in CDX?	7
9. Do Support persons need their identities validated?	7
10. What does Primary mean (AO, Agent/Consultant or Support)?.....	7
11. What does Secondary mean (AO, Agent/Consultant or Support)?.....	7
B. Role Function Questions	8
12. What functions can Authorized Officials (AO) perform in Section 5 Notices and Supports (e-PMN)?	8
13. Who can submit an original/initial submission of the PMN form, biotech form, NOC form, or Bona Fide form?	8
14. What functions can an Agent/Consultant perform in Section 5 Notices and Supports (e-PMN)?.....	8
15. What functions can a Support person perform in Section 5 Notices and Supports (e-PMN)?.....	8
16. Who can create and submit a support form?	9
17. What can I submit using the Support form?.....	9
C. Security Questions	9
18. What is a passphrase?.....	9
19. Who creates the passphrase?	9
20. Where is my data stored?	10
21. Is the data encrypted?.....	10
D. Document Access Questions	10
22. How do I assign support persons to work on a document?.....	10
23. Do I have to give access to a support person for each document separately?.....	10
24. I am an Authorized official who created a form in the new system. Who has access to my data, i.e., can open the document with the passphrase?.....	10

25.	I am an Agent/Consultant who created a form in the new system. Who has access to my data, i.e., can open the document with the passphrase?.....	11
26.	Who can only see my forms in the forms view?	11
27.	If I am an Authorized Official (AO) and I leave the company, how can another AO from the same company have access to my documents?.....	11
28.	If my company changes name, how do I access old company files?.....	11
29.	What if my company bought rights from another company's chemicals, how will I get access to the submission?.....	11
E. Result of Submission Questions		12
30.	When is the Case number assigned?	12
31.	Will I still receive an acknowledgement letter?.....	12
32.	How do I know that EPA has received my submission?.....	12
33.	Why is it important to download my COR?.....	12
F. Document Creation/Population Questions.....		12
34.	How is a Section 5 notice created?.....	12
35.	How do I create a Letter of Support or Joint Submission?	13
36.	In the Thick Client, there was a Profiler to store contact information which allowed for easy download of that information. Does the new online version of the e-PMN have something equivalent?	13
37.	What is a form Alias? How is it used?.....	13
38.	For sections of the e-PMN displayed in an accordion style, do I have to fill in all required fields to save the form?.....	14
39.	How do I enter the Authorized Official information on the form?	14
40.	How do I create a multicomponent (discrete mixture) submission?.....	14
41.	How do I create a consolidated submission?	14
42.	How do I delete a consolidated chemical?.....	15
43.	How do I "copy" my PMN submission in the new version of the e-PMN?.....	15
44.	How do I import data into the new e-PMN software that was starting in the eTSCA PMN software?	15
45.	How do I enter microorganism data into the Bona Fide form?.....	15
46.	Where do I enter my specific site information?.....	15
G. Amend Questions.....		16
47.	When can I "amend" a submission versus when do I have to create a new submission?	16
48.	What if I forget my passphrase to my original notice and then need to make an amendment?	16
49.	How do I amend "new" submissions? How do I amend an "older" submission?	16

H. Modifications Questions.....	16
50. When do I create a Modification to an LVE or LoREX instead of "amending" the original submission?	16
51. I need to submit a Modification to EPA. When do I use a PMN form to modify an LVE or LoREX and when do I use a support form (Communication) to EPA (e.g., a j(6) letter)?	17
I. Attachment Questions.....	17
52. Do I need to upload my sanitized attachments at the same time that I upload my CBI attachments?.....	17
53. Is there a file size limitation for my attachments?	17
54. Will the software sanitize my attachments?.....	17
J. XML Questions.....	17
55. When I am working online, can I save my work in progress locally?	17
56. Can I use the eTSCA Client software to create my documents?	18
57. What is an XML schema?	18
58. Where can the XML schema be found?	18
59. Can I import my data which was created from the Thick Client?.....	18
60. Can my forms created in CDX which are in progress be stored locally?	18
61. Can I work behind my firewall?.....	18
62. Will CBI be designated with the curly brackets in some text fields?	19
63. What is an original Notice submission?.....	19
64. Is there a copy of the PMN form available outside of the software for informational purposes and not for submission?	19
65. If I find my substance in SRS, does this mean my chemical is on the TSCA Inventory?	19

Disclaimer: This Q&A document is not a rule and is not legally enforceable. The document explains some of the electronic reporting requirements in 40 CFR parts 720, 723 and 725 applicable to documents submitted pursuant to those provisions. The document also discusses recommended practices for such submission. The document neither creates any new requirements nor replaces existing established laws or regulations. The use of the word "should" in this document means that something is suggested or recommended, but not required.

A. CDX Related Questions

1. Do I need to register with CDX to submit or to work on section 5 notices?

Yes, you must be registered with CDX and to have a user role approved to work online or to submit Section 5 Notices and Supports forms. Please refer to the CDX Registration user guide for any other questions you may have.

You can use the e-PMN Thick Client (eTSCA) to work on PMN files locally. The xxx.pmn_tsca file (the PMN form) can be uploaded into the online application.

2. Where do I go to register with CDX?

<https://cdx.epa.gov> is the website to register and access the Section 5 Notices and Supports submission software.

There is also a CDX Registration user guide available on the New Chemicals website for quick tutorials regarding the CDX registration process.

<http://www.epa.gov/oppt/newchemicals/e-PMN/e-PMN-index.htm>

3. Can I be registered under more than one company name? What company name should I register for?

Yes, you may register for more than one company name, and can select which organization you will be working under when logging into your CDX account.

In addition, multi-Authorized Official (AO) functionality means that all AOs registered under the same company name will be able to view the forms that other AOs within that company and Agents/Consultants working for the company have created.

The role sponsorship functionality means that if Agents/Consultants create a form, all sponsors of the company he/she represents can also see the form.

To keep the forms secure, select a unique company name to work under (e.g., Company A and Company A, Coatings Division). But remember, that company name will populate on the forms when submitting.

4. What is LexisNexis?

LexisNexis is a third-party identity proofing service that verifies a user's identity.

5. What if I do not pass ID proofing with LexisNexis? What do I have to do?

If the LexisNexis identity validation fails, the user is required to sign and mail a paper electronic signature agreement (ESA) which may take ten (10) business days to process.

6. *If I have been approved for the TSCA workflow, do I need to reregister in CDX to work in the new e-PMN under CSPP workflow?*

If you have been approved for the TSCA workflow, you do not need to re-register in CDX. You will, however, need to add the CSPP program service and update your user role. You have already been identity-proofed and have an approved ESA on-file under the old system. However, you must electronically sign a new ESA.

It is not necessary for legacy CDR registered persons to re-register in CDX; you may, however, need to update your user role.

7. *What role should I register for in CDX?*

There are six user roles: 3 roles are associated with the main forms and its supporting forms (Primary Authorized Official, Primary Support, Primary Agent/Consultant) and 3 roles are associated with the secondary forms (i.e. Joint or Letter of Support) (Secondary Authorized Official, Secondary Support, and Secondary Agent/Consultant).

To determine which role is best for you, please refer to the CDX Registration guide posted on the New Chemicals website;

<http://www.epa.gov/oppt/newchemicals/e-PMN/e-PMN-index.htm>.

8. *Can I have more than one role in CDX?*

It is possible to register for more than one role under a single user ID. You can register under all 6 roles, but under different user IDs.

However, when you access the application, you can only access the application under one user role at a time.

9. *Do Support persons need their identities validated?*

Since a Support user will not have the ability to sign/submit data to EPA, they do not need to undergo the same level of validation as Authorized Officials or Agents/Consultants.

10. *What does Primary mean (AO, Agent/Consultant or Support)?*

Primary is a term used to designate CDX registrants who wish to access and submit main submissions and support documents. Main submissions include: the PMN form, the Biotechnology form, the NOC form, the Bona Fide form and the Alternative Control Measures form.

11. *What does Secondary mean (AO, Agent/Consultant or Support)?*

Secondary is a term used to designate CDX registrants who wish to access and submit Joint and Letter of Support submissions.

B. Role Function Questions

12. What functions can Authorized Officials (AO) perform in Section 5 Notices and Supports (e-PMN)?

All AOs can create, edit, delete, designate Agents/Consultants, designate Supports, unlock, and download the Copy of Record (CoR).

The submitting Primary AO is the person from the submitting company who legally signs, certifies, and submits the initial Notice forms: PMN, NOC, Biotechnology, or Bona Fide. The AO can also submit the Alternative Control Measures (ACM) form and the support form.

The submitting Secondary AO is the person from the joint/Letter of Support company who legally signs, certifies, and submits joint or Letter of Support submissions.

All persons can save, validate to check for errors, and preview documents in progress.

13. Who can submit an original/initial submission of the PMN form, biotech form, NOC form, or Bona Fide form?

The initial submission for these types of notices must be submitted by a Primary Authorized Official from the company who is authorized to legally sign, certify, and submit the initial notice.

Any subsequent amendments to these forms may be submitted by any AO of the submitting company or Agent/Consultant assigned under that company name.

14. What functions can an Agent/Consultant perform in Section 5 Notices and Supports (e-PMN)?

Agents/Consultants can create, edit, delete, unlock, and download the Copy of Record (CoR) for all forms to which they have access and know the passphrase.

The Agents/Consultants **cannot** submit the initial Notice forms: PMN, NOC, Biotechnology, or Bona Fide forms. The Agent /Consultant **can** submit the initial ACM form, all amended forms and Support forms.

All persons can save, validate to check for errors, and preview documents in progress.

15. What functions can a Support person perform in Section 5 Notices and Supports (e-PMN)?

Support persons can only edit documents that are in progress and which have been assigned to them by their Authorized Official.

All persons can save, validate to check for errors, and preview documents in progress.

16. Who can create and submit a support form?

The role of the Support person has changed with the Section 5 Notices and Supports Thin Client application. The Support person will no longer have the ability to create and submit Support forms in the new Section 5 Notices and Supports application. Only Authorized Officials or Primary Agents/Consultants can create and submit Support forms. Registered Support persons will only be able to edit form information once they have been assigned to and given access to the form by an AO.

17. What can I submit using the Support form?

A Support form includes the following subtypes: 'Amendment,' 'Suspension Request,' 'Test Data,' 'Transfer of Ownership,' 'Withdrawal Request,' and 'Other Correspondence.' The purpose of the Support form is to provide additional information, or supplement information to the PMN form.

For the most part, the Support form has not changed except with regards to submitting amendments to the PMN and Biotechnology form. If you submitted an original Notice form using the Thin Client, you cannot amend the original using the Support form; you must unlock the original notice make changes to the information and resubmit.

C. Security Questions**18. What is a passphrase?**

The passphrase is a text string used to encrypt a form (e.g. PMN, Biotechnology, NOC, Support, Bona Fide, or ACM). If you want to edit a form, unlock a submission, or download a Copy of Record (CoR), you will need the passphrase. Only Authorized Officials or Agents/Consultants can create passphrase for forms. This passphrase can be shared with whomever they would like to provide access to open the forms.

If you forget the passphrase for a submission in progress, you must recreate the form and resubmit. If you want to download the CoR of a particular document and you forgot the passphrase, you will need to contact EPA and request a copy.

Also, a passphrase is reusable, so the same passphrase can be used on all forms.

19. Who creates the passphrase?

The person who creates the form creates the passphrase for that form. A passphrase is created or entered on the 'Create Passphrase' or 'Enter Passphrase' screens, respectively.

Since the passphrase cannot be changed once it has been assigned to a form, the passphrase should be decided upon before the form is created amongst members who will be working on the form. You are encouraged to create a passphrase that is easy to remember because it cannot be recovered if lost or forgotten. The same

passphrase can be reused for multiple forms. For example, you may want to use the same passphrase for all forms associated with a case.

20. *Where is my data stored?*

The data will be stored encrypted on the EPA server when logged into the Section 5 Notices and Supports application.

Otherwise, if you are using an XML file, or saving a Copy of Record, this will be stored on your local hard drive, and you are responsible for the security of these items via your computer's security measures.

21. *Is the data encrypted?*

Data stored on the EPA server is encrypted by a passphrase.

Once the Copy or Record is downloaded, it can be stored locally unencrypted.

D. Document Access Questions

22. *How do I assign support persons to work on a document?*

If an Authorized Official (AO) wants one of his/her Support persons (as designated within CDX) to work on a form, the AO must assign the form to this person. Forms are assigned using the 'User Management' tab in the Section 5 Notices and Supports application.

The AO can select the form alias from the 'Form Alias' drop-down menu on the 'User Management' screen and then select the specific Support person(s) from the 'Unassigned' list. Once the specific Support person(s) is/are assigned, the assigned form will appear in a Support person's view when they log into the Section 5 Thin Client.

The AO will need to provide the Support person with the passphrase in order for the Support person to access the form for editing.

Agents / Consultants are not able to assign Support persons to a form.

23. *Do I have to give access to a support person for each document separately?*

Yes. If the AO wants a Support person to have access to one or more forms, the AO must assign access to each form, one at a time, via the 'User Management' tab. It is not possible to assign a Support to multiple forms at one time.

24. *I am an Authorized official who created a form in the new system. Who has access to my data, i.e., can open the document with the passphrase?*

The following persons have access to the document: 1) Any Authorized Officials registered under the submitting company. 2) Any Agent/Consultant or Support person associated with an AO of the submitting company who has been given access by the AO.

This multi-AO functionality allows other Authorized Officials within a submitting company to view forms that other AOs have created.

25. *I am an Agent/Consultant who created a form in the new system. Who has access to my data, i.e., can open the document with the passphrase?*

When an Agent/Consultant logs into CDX, they must select which company they will be working under. When the Agent/Consultant creates a new document, he/she and any Authorized Official from the selected company can then open the document with the passphrase.

26. *Who can only see my forms in the forms view?*

- a. If you are an Authorized official for Company A, you can see all forms created under Company A.
- b. If you are an Agent/Consultant for an AO from Company A, you can see all forms that you created and all forms created by your AO to which you were assigned.
- c. If you are a Support person for an AO from Company A, you can see all forms which were assigned to you by your AO.

27. *If I am an Authorized Official (AO) and I leave the company, how can another AO from the same company have access to my documents?*

Any AO registered under the same company has access to all forms created by any AO of that company (i.e., the forms will be listed in the forms view). To open a form, the AO will need to have the passphrase. Remember, passphrases **cannot** be recovered once lost or forgotten. It is always a good practice to download the Copy of Record to your local hard drive for each form sent to EPA for future reference.

In addition, if the sponsoring AO of an Agent/Consultant leaves the company, then the Agent/Consultant must find another sponsoring AO from the company as their role sponsorship will have been revoked.

28. *If my company changes name, how do I access old company files?*

Users should maintain old company names within CDX registration and keep the passphrase for all documents. Make sure you download the Copy of Record and securely maintain records outside of CDX in case access to the files online is no longer available.

29. *What if my company bought rights from another company's chemicals, how will I get access to the submission?*

The second company (company B) that bought the chemical should request information that was saved locally (i.e., the Copy of Record) from the company whose chemical rights were purchased (company A). Company B **will not have access** to Company A's documents in the Section 5 Notices and Supports application.

If company B is not able to obtain this information from Company A, please request this information from EPA.

E. Result of Submission Questions

30. When is the Case number assigned?

After a form is submitted to EPA, the Section 5 Notices and Supports application will assign a case number within minutes. The case number will appear within the Section 5 Notices and Supports 'Forms' screen, but it may be necessary to refresh the page by selecting the Browser refresh button.

For non-consolidated submissions a single case number is assigned; for consolidated submissions, multiple case numbers are assigned.

After you submit a form to EPA and the submission has been successfully received, the system will provide a Copy of Record (CoR) represented by a green arrow icon.

31. Will I still receive an acknowledgement letter?

Acknowledgement letters will continue to be sent by U.S. mail.

32. How do I know that EPA has received my submission?

In the previous process using the eTSCA/PMN Thick Client software, users would receive emails regarding the CDX transaction ID, and another email with a confirmation of the Copy of Record.

With the new Section 5 Notices and Supports Thin Client, the application generates a Copy of Record (obtained by selecting the green arrow icon) within several minutes of submitting a form, which indicates that EPA has received the form. The application will also generate a single case number for a non-consolidated submission, or multiple case numbers for a consolidated submission. No emails will be generated in this process.

33. Why is it important to download my COR?

It is very important to download the Copy of Record (CoR). The information stored on EPA's server is encrypted using the passphrase. If something happens to the form on the EPA server, or to the passphrase, or to the Authorized Official, etc. **the document cannot be recovered.** A downloaded file, however, is not encrypted and easily shared.

F. Document Creation/Population Questions

34. How is a Section 5 notice created?

The Authorized Official or Agent/Consultant logs into CDX and selects the Primary Authorized Official or Agent/Consultant role within the CSPP workflow. Select 'TSCA Section 5 Notices and Supports - e-PMN' from the CISS drop-down menu.

Users will then have the option to create the following notices and support forms from the Forms screen: 'Premanufacture Notice (PMN),' 'Biotechnology,' 'Notice

of Commencement (NOC), 'Support,' 'Bona Fide,' and/or 'Alternative Control Measures (ACM)' by selecting the form type from the drop-down menu and clicking the 'Start New Form' button.

For specific steps on creating a new notice or support form, refer to the applicable Section 5 Notices and Supports user guide.

35. *How do I create a Letter of Support or Joint Submission?*

Third party submitters will receive an email from the main submitter. In the email will be a unique identifier that Secondary Authorized Official will use to create the Letter of Support or Joint Submission. The Secondary AO will launch the TSCA Section 5 Notices and Supports Thin Client application and from the forms screen, select to create a new document. The system will ask for the unique identifier – it is suggested that this identifier be copied from the email as it can be quite complex. After entering the identifier and a passphrase, the form will appear where the Secondary AO can then either fill out the PMN information, attach supporting information in a file, or enter the supporting information in the cover letter.

***Please note that the joint or Letter of Support document cannot be submitted to EPA until the main submission has been filed.

36. *In the Thick Client, there was a Profiler to store contact information which allowed for easy download of that information. Does the new online version of the e-PMN have something equivalent?*

The TSCA Section 5 Notices and Supports Thin Client application does not have an equivalent profiler feature. However, there is an option for the person logged into a form to populate the agent or technical contact information with their CDX registration information. If the person filling out the form is not the agent/technical contact then this information will need to be entered manually. The submitting person's information will automatically populate within the form during the submission process.

Note: a user may use Google Chrome as a browser which allows you to auto-populate information that is consistently re-used.

37. *What is a form Alias? How is it used?*

When you create a form, you will be given the option to provide a user defined alias for the form. The form alias is a text description entered by a user into a field in the form to assist in locating and organizing multiple forms within the application. The form alias can be edited by any user who has access to the form.

As a hint, you may want to define a naming convention to be used for all documents under one case number.

Within the application you may view forms in a dashboard view. The form alias is also used on the 'User Management' page to identify and assign specific forms to Support users or company registered Agents/Consultants.

38. *For sections of the e-PMN displayed in an accordion style, do I have to fill in all required fields to save the form?*

There are several screens within the Section 5 Notices and Supports application which will not allow you to move forward without filling out all required data. This is especially true for sections of the form which utilize expandable/collapsible field sets. All required data must be entered in the expandable/collapsible field set before the field set data can be saved. Screens without expandable/collapsible field sets can be saved and users can move to another screen using the links within the navigation tree instead of using the 'Previous' and 'Next' buttons.

However, there are some forms within the application (i.e., Letters of Support or Joint Submissions) where the validation varies, and not all fields may be required within an expandable/collapsible field set.

39. *How do I enter the Authorized Official information on the form?*

The submitting company Authorize Official's information is not manually entered; the information will be pre-populated on the 'Submitting Official Information' page during the submission process.

The fields on the submitting AO screen are not editable. Any changes to the AO information must be made within CDX registration information.

If you are not the correct person to submit data to EPA or if the CDX registration data is incorrect, you may cancel the submission process at any time.

40. *How do I create a multicomponent (discrete mixture) submission?*

The new Section 5 Notices and Supports application can easily accommodate multi-component chemical submissions. A multi-component chemical submission is one where two or more chemicals are **always** generated together in one pot and are **never** isolated.

Add each chemical component by clicking the 'Add Chemical Component' button on the 'Class 1 or 2 Chemical Substances' or 'Polymer Identification Information' screen.

41. *How do I create a consolidated submission?*

In order to create a consolidated submission, the user needs to create a file folder for the first chemical. Subsequent consolidated chemicals are generated by clicking the 'Add Consolidated Chemical' link to add a new set of chemical screens within the navigation tree.

Chemicals with similar chemical ID information (PMN pages 4, 5 and 6) can be copied by clicking the 'Copy' link within the navigation tree. However, neither the

chemical name nor CASRN will be copied. Attachments are also removed and must be uploaded again.

42. How do I delete a consolidated chemical?

To delete a chemical within a consolidated submission, click the 'Remove' link (red 'X' icon) within the navigation tree within the folder for the particular chemical you would like to remove. After clicking the 'Remove' link there is no way to recover the deleted chemical folder.

Please note: the 'Remove' link is only available if the user is not currently working on one of the selected chemical's screens.

43. How do I "copy" my PMN submission in the new version of the e-PMN?

Copies of PMN forms are created by uploading an XML file into a new Section 5 Notice and Supports PMN form. **The XML file must be called formdata.xml and the XML file must be stored in a zipped file in order for the import to occur. Note: the xxx.pmn tsca file is a zipped file.**

The XML can be created one of 3 ways: 1) a company can create a program outside of the e-PMN software to generate the XML; 2) XML can be exported from a submission in progress in the Thin Client by selecting the "Upload XML" button on the bottom left of the screen and then select to "export XML"; or 3) XML is created by the ePMN software (both Thin Client and Thick Client) and found in the Copy of Record.

Once the XML has been imported, upload any necessary attachments. Lastly, check the system validation to ensure that there are no errors; check the pdf to check for missing information.

44. How do I import data into the new e-PMN software that was starting in the eTSCA PMN software?

The XML of the data stored in your eTSCA file (xxx.pmn_tsca) can be imported into a new Section 5 Notice and Supports PMN form. Select the "Upload XML" button on the bottom right of the application and then select "Upload Archive file". Select the eTSCA file to upload

45. How do I enter microorganism data into the Bona Fide form?

To enter microorganism data into the Bona Fide form of the software, select the Class 1 or 2 option then fill out the rest of the form as if the substance was a Class 2 substance.

46. Where do I enter my specific site information?

Site information will be stored in CDX under the Authorized Official's user account or the Agent/Consultant's user account. You can learn how to add a facility to a user's account in the User's Guides. Once the site has been added, it will be available from a dropdown list in the PMN form under sites controlled by the submitter and under sites controlled by others or on the NOC form.

G. Amend Questions

47. When can I "amend" a submission versus when do I have to create a new submission?

EPA will notify the submitter to say if the submission can be amended or if the submission is incomplete. A submission marked as incomplete by EPA cannot be "revised" or "amended"; a new form must be created and submitted. The resubmission will be given a new day 1 and a new case number.

48. What if I forget my passphrase to my original notice and then need to make an amendment?

If a form was created online in the Section 5 Notices and Supports application, and the passphrase was forgotten, the form cannot be opened or recovered. To create an amendment, create a Support form and designate it as "Other Correspondence." Attach or describe any amended information.

49. How do I amend "new" submissions? How do I amend an "older" submission?

The procedure for amending a form is dependent on how the original form was created and submitted to EPA.

1) Amendments to submissions originally created and submitted using the online Section 5 Notices and Supports application are made by unlocking submissions on the 'Section 5 Notices and Supports Forms' screen, making changes, providing a reason for the amendment and resubmitting.

2) Amendments to submissions sent to EPA using the eTSCA EPA Thick Client are submitted via a Support form and selecting 'Amendment' as the type of support.

H. Modifications Questions

50. When do I create a Modification to an LVE or LoREX instead of "amending" the original submission?

An amendment is typically a change to an original notice during the 30-day review period for an LVE or a LoREX submission. After the 30-day review period has expired and the changes constitute a Modification as defined by 40 CFR 723, the submitter must create a new Premanufacture Notice (PMN) form and select LVE Modification or LoREX Modification as the form type. These Modifications will receive a new case number (LM or XM) and a new 30-day review period.

If there are questions, contact the TSCA hotline at 202-554-1404 or facsimile at 202-554-5603.

51. *I need to submit a Modification to EPA. When do I use a PMN form to modify an LVE or LoREX and when do I use a support form (Communication) to EPA (e.g., a j(6) letter)?*

For an already-approved LVE, you can send a notification in the form of a letter as a support document (select Other Correspondence as the Support form subtype) to the existing LVE and need not file a request for modification requiring 30-day review by the Agency if your site change meets the criteria of 40 CFR Sec. 723.50(j)(6). The (j)(6) notification must be received by the Agency before the 30th day after first manufacture at the new site.

If your changes to the LVE or LoREX do not meet the criteria for 40 CFR Sec. 723.50(j)(6), use the PMN form and select LVE Modification or LoREX Modification as your PMN form subtype. These modifications receive a new case number and will go through the full 30-day review.

I. Attachment Questions

52. *Do I need to upload my sanitized attachments at the same time that I upload my CBI attachments?*

The online application performs immediate validation to ensure that the CBI files have sanitized files attached. Therefore, if you mark your attachment as CBI, you must attach the sanitized file. If a user does not want to upload the sanitized file along with the CBI file, the user may mark the file as non-CBI and then later change the CBI status when the user is ready to upload the sanitized file. However, do not forget to go back and change the CBI status of the attachment if you choose to do this option.

53. *Is there a file size limitation for my attachments?*

There is no actual file size limit, but you are limited to your network bandwidth and the application timeout of ten (10) minutes per single file upload.

54. *Will the software sanitize my attachments?*

No, the application will not sanitize attachments; the software only sanitizes fielded data. Sanitized attachment files will need to be created outside of the Section 5 Notices and Supports application. In order for data in the form fields to be sanitized, you will need to flag the specific data fields as CBI by checking the associated 'CBI' checkbox.

J. XML Questions

55. *When I am working online, can I save my work in progress locally?*

Within the current eTSCA Thick Client, users are able to save their working files to their hard drive. With the new Thin Client, in-progress forms will be created and saved online.

A user can export a partial XML in the Thin Client. Only the fields that were populated in the Thin Client will be exported – not attachments. Please note that, if the field was not populated in the Thin Client, blank fields will not be available in the exported XML file.

To export data to XML, select the “Upload XML” button on the bottom left of the application. Then select “Export XML”.

56. *Can I use the eTSCA Client software to create my documents?*

The eTSCA Thick Client will not be removed from a person’s computer if was previously installed. The option to download the eTSCA Client lite will also be available from the New Chemicals website. However, this software will not be maintained. Users will be able to save forms created within the Thick Client (PMN form only, saved as xxx.pmn_tsca) and upload them to the Thin Client using the upload XML functionality. Attachments uploaded within the Thick Client will not be imported and must be reattached in the Thin Client.

57. *What is an XML schema?*

According to WIKIPEDIA, **Extensible Markup Language (XML)** is a markup language that defines a set of rules for encoding documents in a format that is both human-readable and machine-readable. The data fields defined in the XML schema can allow users to upload XML data into a blank PMN form, or export in-progress PMN form data into an XML file.

The XML file allows users to work on forms outside of the Thin Client application, or to populate forms for similar chemicals.

58. *Where can the XML schema be found?*

The Section 5 Notices and Supports extensible markup language (XML) schema for the PMN form will be available on the New Chemical Programs website: <http://www.epa.gov/oppt/newchems/e-PMN/e-PMN-index.htm>

59. *Can I import my data which was created from the Thick Client?*

Yes, but only for the PMN form; PMN forms (xxx.pmn_tsca) are uploaded into a blank PMN form within the Thin Client using the upload XML functionality. Attachments will need to be re-uploaded one at a time.

60. *Can my forms created in CDX which are in progress be stored locally?*

Yes, partial XML files can be downloaded and saved locally. Export the XML by selecting the “Upload XML” button on the bottom of the application followed by selecting the “export XML” button.

61. *Can I work behind my firewall?*

Yes; the purpose of the XML schema for the PMN form is for users to work locally and offline. The XML can then be uploaded into a PMN form, attachments can be uploaded, and the form can be validated to make sure that there are no errors, and then submitted to EPA.

62. Will CBI be designated with the curly brackets in some text fields?

Some of the large text fields in the eTSCA downloaded software allowed CBI to be designated within the field by surrounding the text with braces {e.g., enter CBI here}). With the new Section 5 Notices and Supports application Thin Client, these fields are now considered to be entirely CBI or entirely non-CBI by selecting a single CBI checkbox for the field.

63. What is an original Notice submission?

An original Notice submission is defined as the first time a Premanufacture Notice (PMN), Biotechnology, Notice of Commencement (NOC), or Bona Fide form is ever submitted to EPA. Subsequent changes to these forms are referred to as amended or modified notices.

Support forms or Alternative Control Measure (ACM) forms will never be considered an original form.

64. Is there a copy of the PMN form available outside of the software for informational purposes and not for submission?

The Premanufacture Notice (PMN) PDF will be included as a link on the New Chemicals Program website (<http://www.epa.gov/oppt/newchems/e-PMN/e-PMN-index.htm>). A Notice of Commencement (NOC) PDF will also be posted on the website.

65. If I find my substance in SRS, does this mean my chemical is on the TSCA Inventory?

No. If you find your chemical in the Substance Registry Services (SRS), this does not necessarily mean that the chemical is on the TSCA Inventory.

If you are searching by CAS number on the public TSCA Inventory or SRS and the chemical is not found, it could be located on the confidential portion of the TSCA Inventory. In which case, a Bona Fide form can be created and submitted within the Section 5 Notices and Supports application to have EPA determine whether or not a chemical is located on the confidential portion of the TSCA Inventory.