

eDisclosure User's Guide

Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency

Prepared with assistance from
CGI Federal

NOTICE

This guide does not necessarily represent final EPA decisions or positions. It is intended to illustrate how EPA's eDisclosure system operates. EPA reserves the right to revise the system's operational features. This guide does not supersede any statutory or regulatory requirements, is subject to change, and is not independently binding on either EPA or covered entities. Additionally, if a conflict exists between this guide and the statutory or regulatory requirements, or the eDisclosure system, the conflict must be resolved in favor of the statute or regulation.

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1. Introduction

This document is a User's Guide for the eDisclosure Voluntary Disclosure system developed within EPA's Central Data Exchange (CDX). eDisclosure provides a new streamlined approach to more efficiently processing disclosed violations submitted to the Agency under the Audit Policy and Small Business Compliance Policy.

EPA believes strongly in the benefits of the Audit Policy and the Small Business Compliance Policy: to encourage companies to self-police, disclose, correct and prevent violations. These benefits can be achieved in a manner that saves transaction costs, increases efficiency, and provides quicker decisions. In response to suggestions from regulated entities, EPA has decided to modernize implementation of self-disclosure policies by creating a centralized web-based "eDisclosure" portal to process self-disclosed violations.

Each disclosure will be processed through the eDisclosure portal as either a "Category 1" or a "Category 2" disclosure.

Category 1 Disclosures include EPCRA violations that meet all Audit Policy or Small Business Compliance Policy conditions, but do not include: (1) CERCLA 103/EPCRA 304 chemical release reporting violations; or (2) EPCRA violations with significant economic benefit as defined by EPA.

For disclosures that qualify as Category 1, the eDisclosure system will automatically issue an electronic Notice of Determination (eNOD) confirming that the violations are resolved with no assessment of civil penalties, conditioned on the accuracy and completeness of the submitter's certified eDisclosure.

Category 2 Disclosures include: (1) all non-EPCRA violations; (2) EPCRA violations where the violator can only certify compliance with Audit Policy Conditions 2-9 (i.e., discovery was not systematic), and (3) EPCRA/CERCLA violations excluded from Category 1.

For disclosures that qualify as Category 2, the eDisclosure system will automatically issue an electronic Acknowledgement Letter (AL) confirming EPA's receipt of the disclosure, and promising that EPA will make a determination as to eligibility for penalty mitigation if and when it considers taking an enforcement action for environmental violations.

This document provides a guide on how to use the system for the following actions:

1. Disclose Violations
2. Disclose Previously Disclosed EPCRA Violations
3. Request Extensions
4. Certify Compliance
5. Share Access to Disclosures

NOTE: The screen shots provided in this document contain the names of facilities used during the development and testing of the eDisclosure portal. Inclusion of such facility- and company-specific data is for illustrative purposes only, and is not intended to represent or imply that any such entities had or have actual violations of the law

1.1. Creating a New CDX Account

The eDisclosure application is accessible via EPA's CDX application. First time users will need to create a new account and register for eDisclosure.

When creating a new CDX account you will:

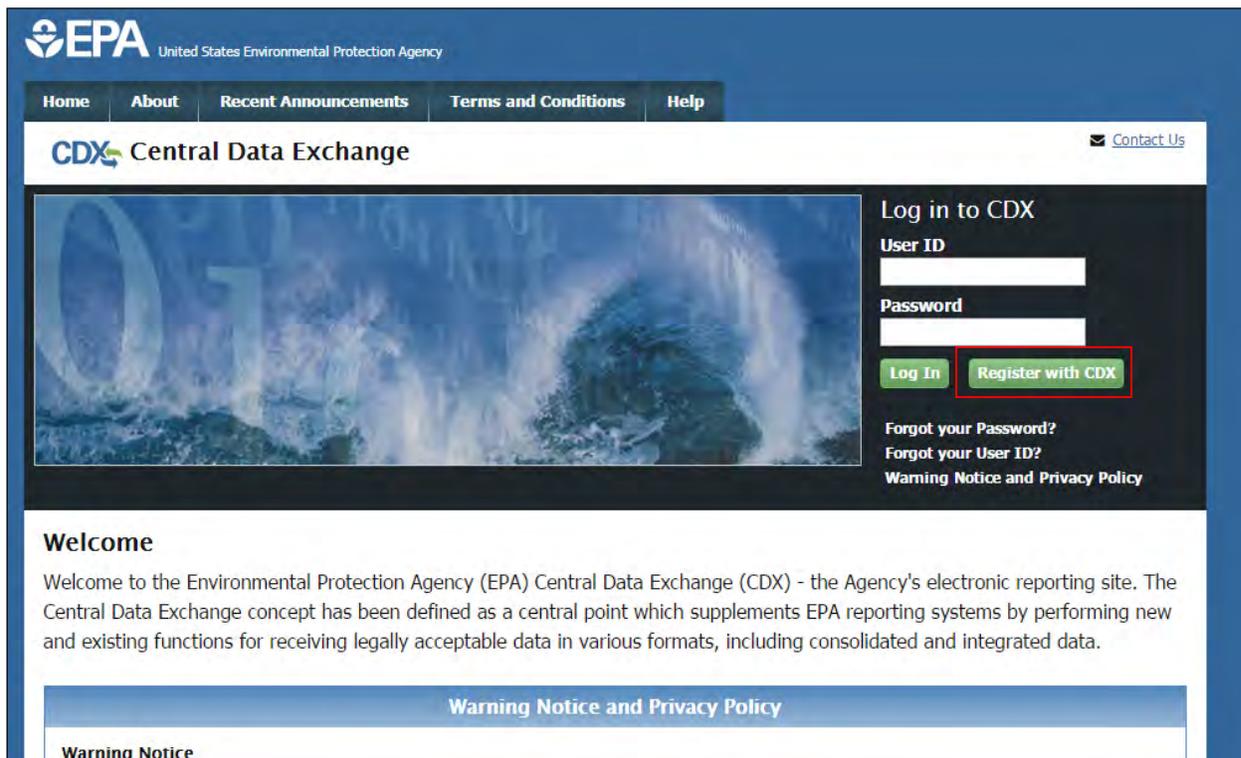
- Select a Program Service and associated role
- Establish a user name and password
- Set security questions
- Select an organization
- Provide contact information.

CDX is accessible at <https://cdx.epa.gov> . This will take you to the Central Data Exchange home page. Click on the "Register with CDX" button to start creating a new account as shown in Figure 1-1.

You can also use the following URL:

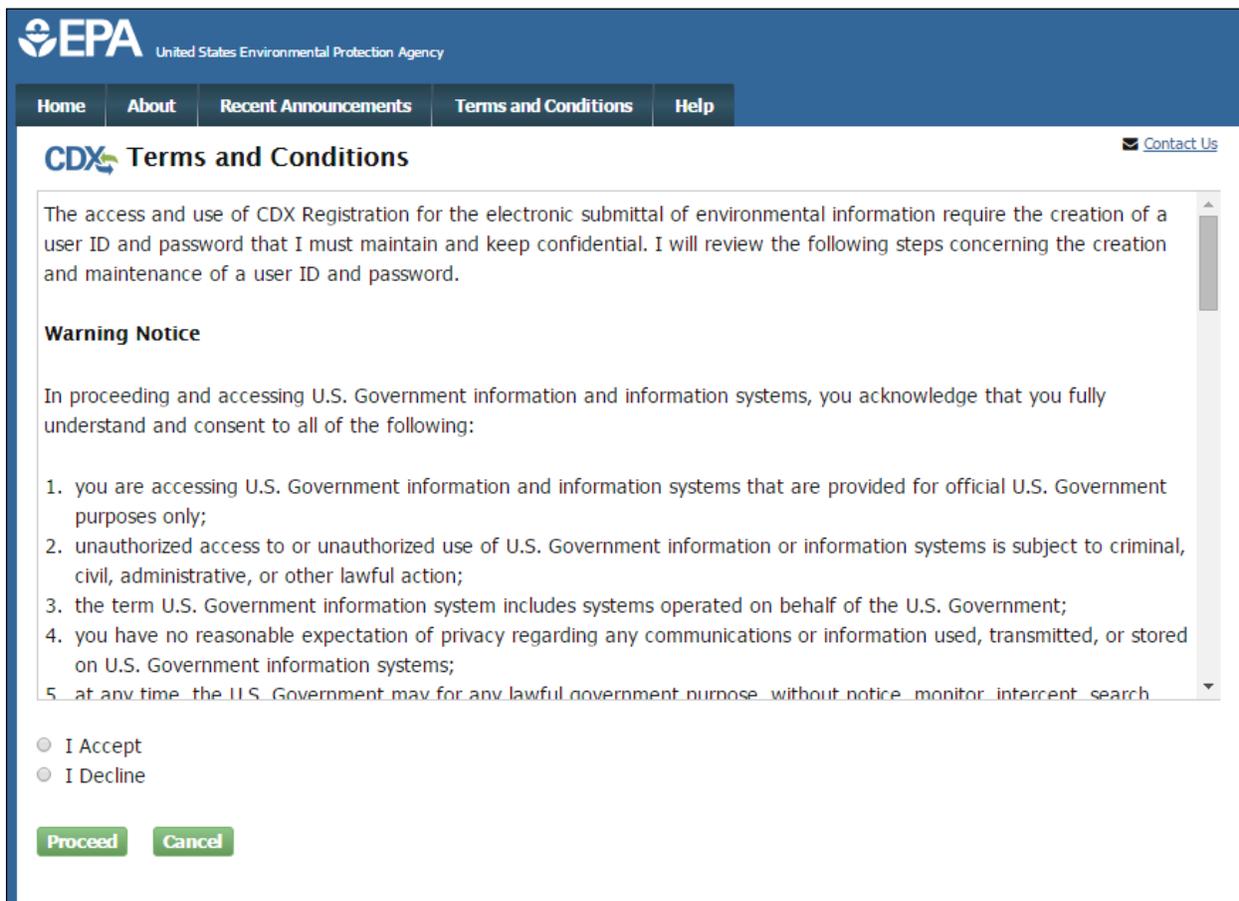
<https://cdx.epa.gov/RegistrationRequest?Dataflow=eDisclosure>. This will route you directly to the Terms and Conditions page.

Figure 1-1 CDX Home Page



In either case, you will be routed to the CDX Terms and Conditions page. Use the scroll bar to read the complete terms and conditions. Click on the “I Accept” radio button and the “Proceed” button when ready (Figure 1-2). You will not be able to proceed with registration until the Terms and Conditions have been accepted.

Figure 1-2 CDX Terms and Conditions Page



On the Program Service selection screen, you will see all available Programs within CDX. You will need to select eDisclosure. You can scroll through the list and click “eDisclosure: Voluntary Disclosure System” from the Active Program Services List; or filter the list by typing the program name in the text box as shown in Figure 1-3.

Figure 1-3 Select Program Service

The screenshot shows the EPA eDisclosure website interface. At the top is the EPA logo and navigation links: Home, About, Recent Announcements, Terms and Conditions, and Help. The main heading is "CDX Core CDX Registration" with a "Contact Us" link. Below this is a progress bar with four steps: 1. Program Service (highlighted), 2. Role Access, 3. User and Organization, and 4. Confirmation. A search prompt asks the user to begin typing a program service name or related keywords. Below the search prompt is a list of "Active Program Services" with a search input field containing "eD". The list includes: ACRES: Assessment Cleanup and Redevelopment Exchange System, CEDRI: Compliance and Emissions Data Reporting Interface, CROMERRS: CROSS-Media Electronic Reporting Rule Services, CSPP: Submissions for Chemical Safety and Pesticide Programs, eDisclosure: Voluntary Disclosure System (highlighted in blue), LEAD: Lead-Based Paint Program, OTAQEMTS: Office of Transportation and Air Quality EPA Moderated Transaction System, OTAQWaiverCredits: Cellulosic Biofuel Waiver Credits Pay.gov Application, and PSP: Pesticide Submission Portal.

EPA United States Environmental Protection Agency

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CDX Core CDX Registration [Contact Us](#)

1. Program Service 2. Role Access 3. User and Organization 4. Confirmation

Begin typing a program service name or related keywords to filter the list of available services (e.g., air quality system, AQS, or Clean Air Act).

Active Program Services List

eD

ACRES: Assessment Cleanup and Redevelopment Exchange System

CEDRI: Compliance and Emissions Data Reporting Interface

CROMERRS: CROSS-Media Electronic Reporting Rule Services

CSPP: Submissions for Chemical Safety and Pesticide Programs

eDisclosure: Voluntary Disclosure System

LEAD: Lead-Based Paint Program

OTAQEMTS: Office of Transportation and Air Quality EPA Moderated Transaction System

OTAQWaiverCredits: Cellulosic Biofuel Waiver Credits Pay.gov Application

PSP: Pesticide Submission Portal

You will then be prompted to select a role from the dropdown field. Selecting Discloser/Certifier will display a description of the role duties as shown in Figure 1-4. Click on the “Request Role Access button” to proceed.

Figure 1-4 Select Role

EPA United States Environmental Protection Agency

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CDX Core CDX Registration [Contact Us](#)

1. Program Service ✓ 2. Role Access 3. User and Organization 4. Confirmation

Registration Information	
Program Service	Voluntary Disclosure System
Role	Not selected

Select a role from the drop down list and provide any required additional information, if applicable.

By clicking Request Role Access, you understand that you intend to disclose to the United States Environmental Protection Agency (EPA) potential violations of Federal Environmental Laws, regulations, and/or requirements. EPA will assess your disclosure and provide a notice of determination or acknowledgement letter in accordance with Audit Policy/ Small Business Compliance Policy.

Select Role

On the following screen, you will need to provide your user and organization information. For the “Part 1: User Information” section you will need to enter a User ID, personal information, a password, and security questions. Make note of this information, as it will be used to access eDisclosure. Please see Figure 1-5 to view all required fields. On-screen messages will be displayed if you do not meet the User ID and password requirements.

Figure 1-5 User Information

Please fill out all required fields marked with an asterisk(*)

Part 1: User Information

The program you are registering for requires additional proof of identity. Later in the registration process you will be given the option to use LexisNexis, an identity proofing service. LexisNexis will pull your first, middle and last name exactly as it is entered on this page.

User ID *	<input type="text"/>
Title *	<input type="text" value="Mr"/>
First Name *	<input type="text"/>
Middle Initial	<input type="text"/>
Last Name *	<input type="text"/>
Suffix	<input type="text" value="-Please Select-"/>
Password *	<input type="text"/>
Re-type Password *	<input type="text"/>
Security Question 1 *	<input type="text" value="-Please Select-"/>
Security Answer 1 *	<input type="text"/>
Security Question 2 *	<input type="text" value="-Please Select-"/>
Security Answer 2 *	<input type="text"/>
Security Question 3 *	<input type="text" value="-Please Select-"/>
Security Answer 3 *	<input type="text"/>

In “Part 2: Organization Info”, you will need to select an organization. Note that you should select the organization on whose behalf you are disclosing. The organization may or may not be the same organization you are employed by (Figure 1-6). Enter the organization name and click on the “Search” button. A list of organization names will display for you to select from. If you can't find the organization you are searching for, you will be given the option to submit a request to add a new organization.

Figure 1-6 Organization Information

Part 2: Organization Info

Search for your organization using the text box below. You may search by entering the Organization Name or the Organization ID.

Select the organization you are disclosing a violation on behalf of. The organization may or may not be the same organization you are employed by (i.e. if you are legal representation).

Once you select the organization it will display on the screen and you will be prompted to enter an email address and phone number as displayed in Figure 1-7. When ready, click on the “Submit Request for Access” button.

Figure 1-7 Organization Information-Email and Phone Number

Part 2: Organization Info

ABC SYSTEMS
123 ELM ST
ALEXANDRIA, VA, US
22021

Email *

Re-enter Email *

Phone Number *

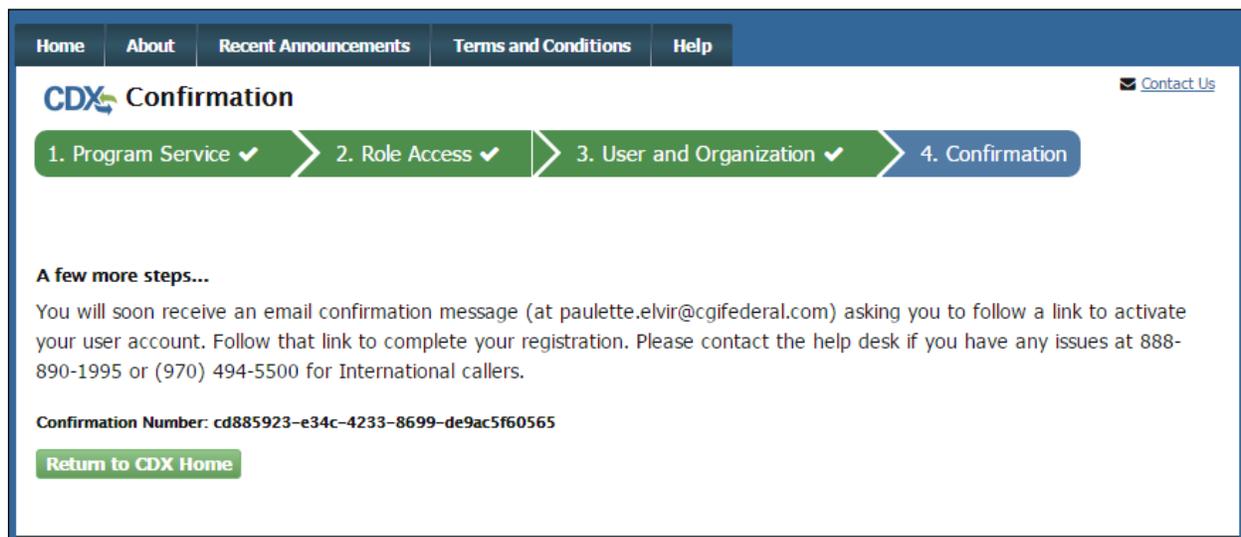
Phone Number Ext

Fax Number

Wrong organization information? [Back to Search Results](#), [Use advanced search](#) or [request that we add your organization](#).

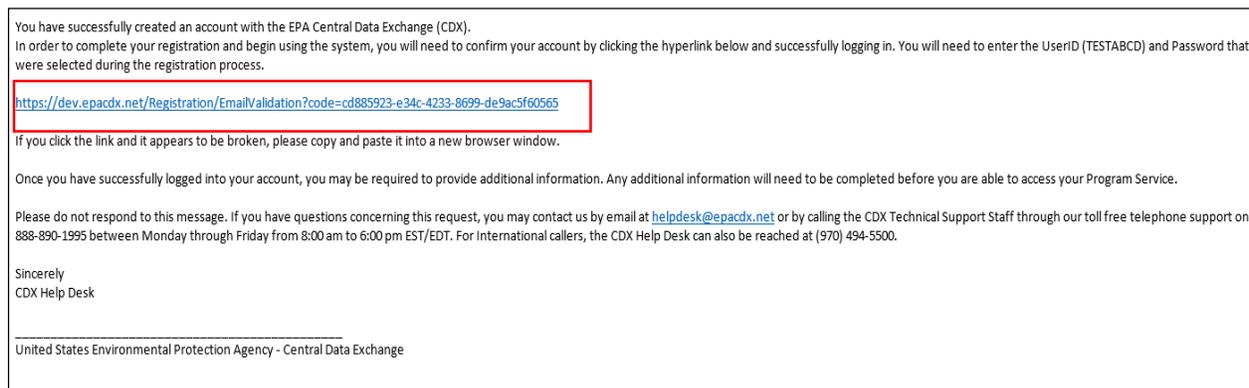
A confirmation screen will display indicating you will receive an email confirmation message with additional steps to complete registration. (Figure 1-8).

Figure 1-8 CDX Confirmation



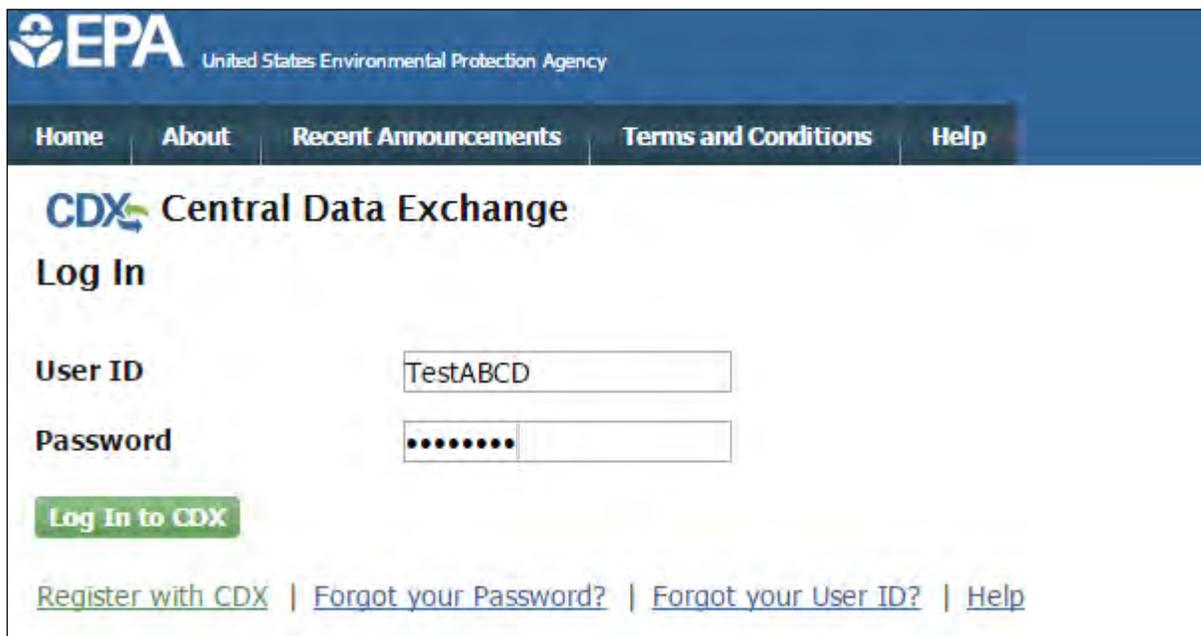
You should receive an email from helpdesk@epacdx.net with Subject line “Core Registration Email Verification Request”. If you do not receive the message, please check your Spam folders. Click on the hyperlink included in the email to confirm registration (Figure 1-9). You will not be able to access the eDisclosure application until you click the link in your email and log in successfully.

Figure 1-9 Email Confirmation



You will be prompted to enter your User ID and Password as shown in Figure 1-10. When ready click on the “Log In to CDX” button.

Figure 1-10 Account Confirmation Log In



The screenshot shows the EPA CDX Central Data Exchange Log In page. At the top, there is the EPA logo and the text "United States Environmental Protection Agency". Below this is a navigation bar with links for "Home", "About", "Recent Announcements", "Terms and Conditions", and "Help". The main heading is "CDX Central Data Exchange" followed by "Log In". There are two input fields: "User ID" with the text "TestABCD" and "Password" with a masked password of ".....". A green "Log In to CDX" button is positioned below the password field. At the bottom, there are four links: "Register with CDX", "Forgot your Password?", "Forgot your User ID?", and "Help".

Upon logging in, the CDX Registration: Additional Verification Screen will display. Due to the nature of submitted Disclosures which must be certified, you must be identity-proofed before gaining access to the eDisclosure application in order to meet Cross-Media Electronic Reporting Rule (CROMERR) requirements.

CDX offers the opportunity to do so electronically by using the third party service, LexisNexis. If you opt out of this service, you will need to print, sign and mail a paper form by clicking on the 'sign the paper form hyperlink. Please note that when choosing the paper route you will still be able to start disclosing a violation, but should only be able to certify compliance until EPA has received a signed copy of the Paper CDX Electronic Signature Agreement (ESA). The address where the ESA must be sent to will be displayed on the paper form.

To proceed with LexisNexis verification, click on the checkbox and then the "Proceed to Verification" button as displayed in Figure 1-11. A pop-up window will display for you to enter personal information and confirm your identity (Figure 1-12). Once you have completed the information click on the "Submit" button.

Figure 1-11 CDX Registration: Additional Verification

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CDX **CDX Registration: Additional Verification** [Contact Us](#)
Logged in as TESTABCD ([Log out](#))

1. Identity Verification 2. Electronic Signature Agreement

The program you are registering for requires additional proof of identity. Your options are to use LexisNexis®, an independent 3rd-Party electronic identity proofing service or to print and submit a signed form through U.S. Postal Mail to the U.S. Environmental Protection Agency.

Note: By clicking [Proceed to Verification] you understand the service is voluntary and that you are validating personally identifying information including the last 4 digits of SSN against a 3rd-Party service LexisNexis®, which will return evidence of validation of your personally identifying information back to the U.S. Environmental Protection Agency. The U.S. EPA will not collect or retain sensitive, personally identifying information such as your Social Security Number (SSN); however, EPA will receive evidence of identity validation which may be used to identify you for legal purposes.

You may [sign the paper form](#) if you do not want to use the automatic verification process.

Note: You will receive a limited number of attempts to complete identity verification. Please review all personal information carefully prior to submitting. If you need to modify the personal information listed below, please contact the [CDX Help Desk](#).

First Name: Paulette
Last Name: Elvir

I have reviewed the name presented above and I would like to proceed with LexisNexis. [Additional LexisNexis Identity Proofing Guidance](#)

Figure 1-12 LexisNexis Identity Verification



The image shows a web form for LexisNexis identity verification. At the top left is the LexisNexis logo, a red sphere with a white dot. To its right is the text "LexisNexis" in black, followed by a vertical bar and "Verification for EPA" in red. Below this is a section titled "* Required Fields". Underneath is a sub-section titled "Authorized Representative" with a dotted line separator. The form contains several input fields: "Last Name *" with the value "Elvir", "First Name *" with the value "Paulette", and "Middle Name" which is empty. Below these is "SSN (Last 4) *" which is empty. Then "Home Address *" which is empty. Below that are "Home City *" (empty), "Home State *" (a dropdown menu showing "-- State --"), and "Home Zip *" (empty). At the bottom of the form are "Home Phone" (empty) and "Date of Birth *" (empty). To the right of these fields are two red buttons: "Submit" and "Cancel". At the very bottom of the form is a footer: "Copyright © 2015 LexisNexis. All rights Reserved. [Terms & Conditions](#) | [Privacy & Security](#)".

Once your identity has been verified via LexisNexis, you will be required to select five challenge questions and answers. Enter the required information and click on the “Save Answers” button as displayed in Figure 1-13. Please make note of your answers since they will be used during electronic signature process of the compliance certification.

If LexisNexis is unable to verify your information, you will be defaulted to the paper route.

Figure 1-13 Challenge Questions

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CDX Central Data Exchange [Contact Us](#)
Logged in as TESTABCD ([Log out](#))

CDX Registration: Additional Verification

1. Identity Verification ✓ 2. Electronic Signature Agreement

You are registered for a program that requires eSignature PIN Verification. Please select five (5) challenge questions and answers. The questions that you select should be questions that you can remember, but difficult for anyone else to guess.

Select 5 Challenge Questions and Answers

<input type="text"/>	<input type="text"/>

Save Answers

After your 5 Challenge Question and Answers have been saved, you will be directed to the Electronic CDX Electronic Signature Agreement page, which is an agreement between yourself and CDX that will authorize your electronic signature. Once the ESA has been signed, you will be authorized to sign information for eDisclosure. Click the 'Sign Electronically' button in order to proceed as shown in Figure 1-14.

Figure 1-14 Electronic Signature Agreement Page

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CDX CDX Registration: Additional Verification [Contact Us](#)
Logged in as TESTERDISC1 ([Log out](#))

1. Identity Verification ✓ 2. Electronic Signature Agreement

Electronic CDX Electronic Signature Agreement

The CDX electronic signature agreement (ESA) is an agreement between yourself and CDX that will authorize your electronic signature. By signing the ESA you agree to adhere to the conditions listed on the agreement below. Once the ESA has been signed, you will be authorized to sign and/or encrypt information for your data flow. For any questions regarding the CDX ESA please contact the [CDX Help Desk](#).

U.S. Environmental Protection Agency ELECTRONIC SIGNATURE AGREEMENT

In accepting the electronic signature credential issued by the U.S. Environmental Protection Agency (EPA) to sign electronic documents submitted to EPA's Central Data Exchange (CDX), and as a representative for:

Electronic Signature Holder Company Information

Organization Name:	ABC
Address:	123 MAIN ST
City, State, Zip:	FAIRFAX, VA 22030
Province:	
Country:	US
Phone Number:	(703) 888-9996
E-mail Address:	paulette.elvir@cgifederal.com
Registrant's Name:	Mrs Paulette Elvir
CDX User Name:	TESTERDISC1

[Sign Electronically](#) [Cancel](#)

You will then be prompted to accept the electronic signature certification statement (Figure 1-15). After accepting you will be prompted first for your CDX password, and then will be asked to answer one of your five secret questions (selected in Figure 1-13). Once both have been provided correctly, you will be able to click the 'Sign' button as shown in Figure 1-16.

Figure 1-15 Certification Statement

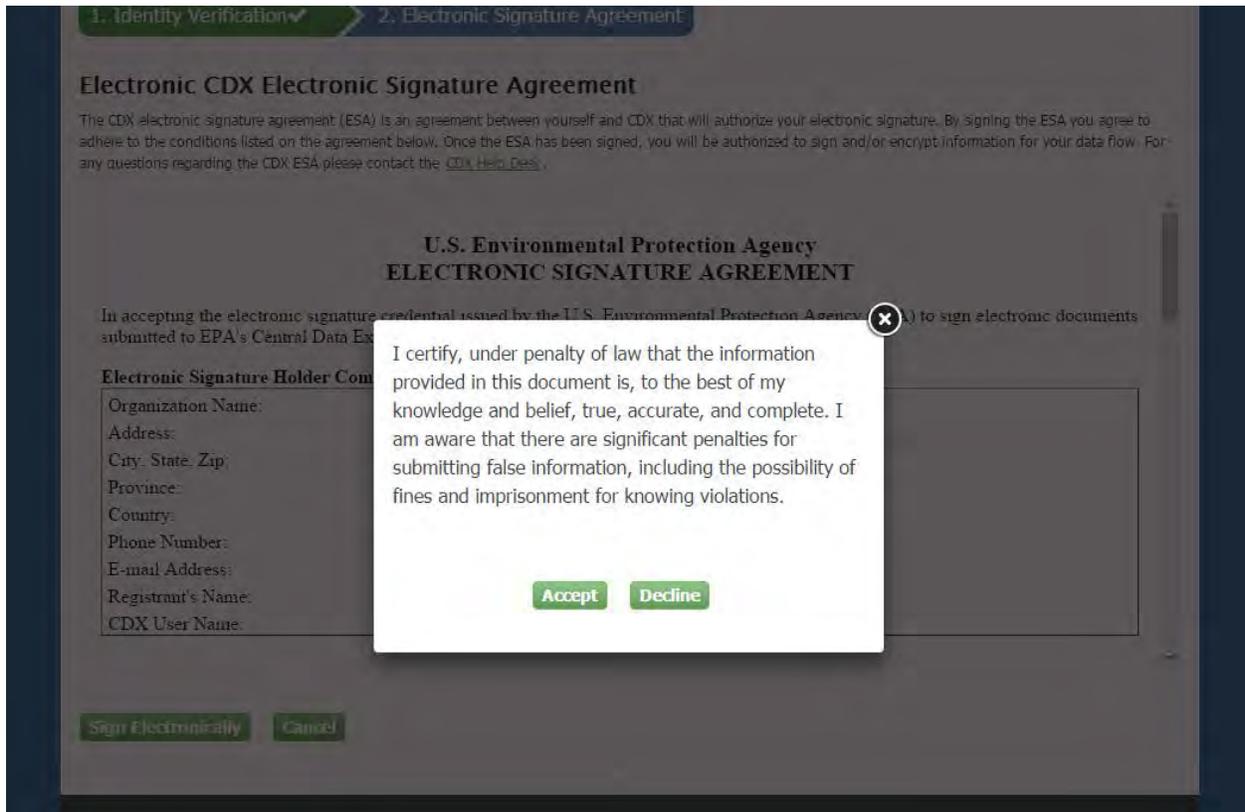
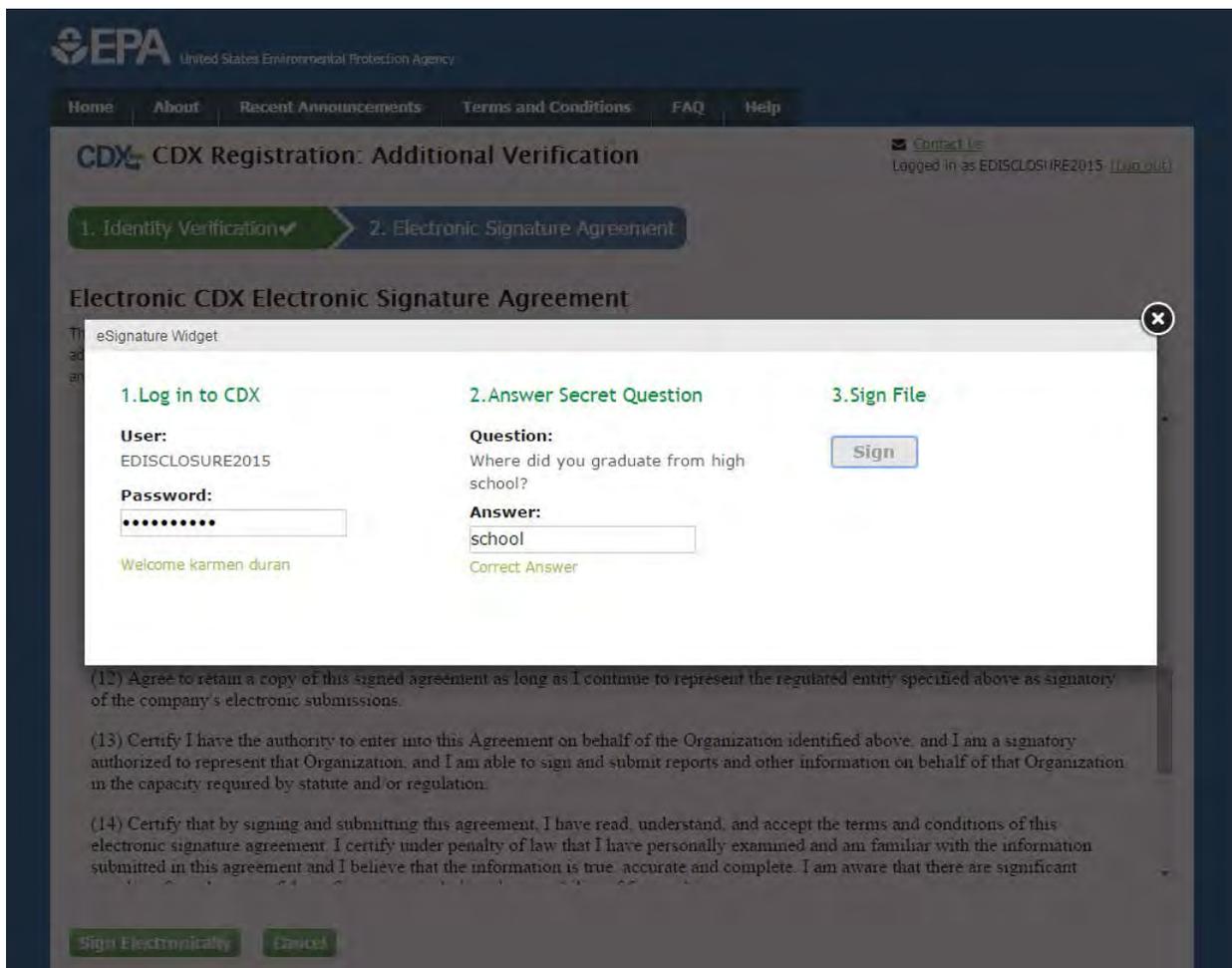
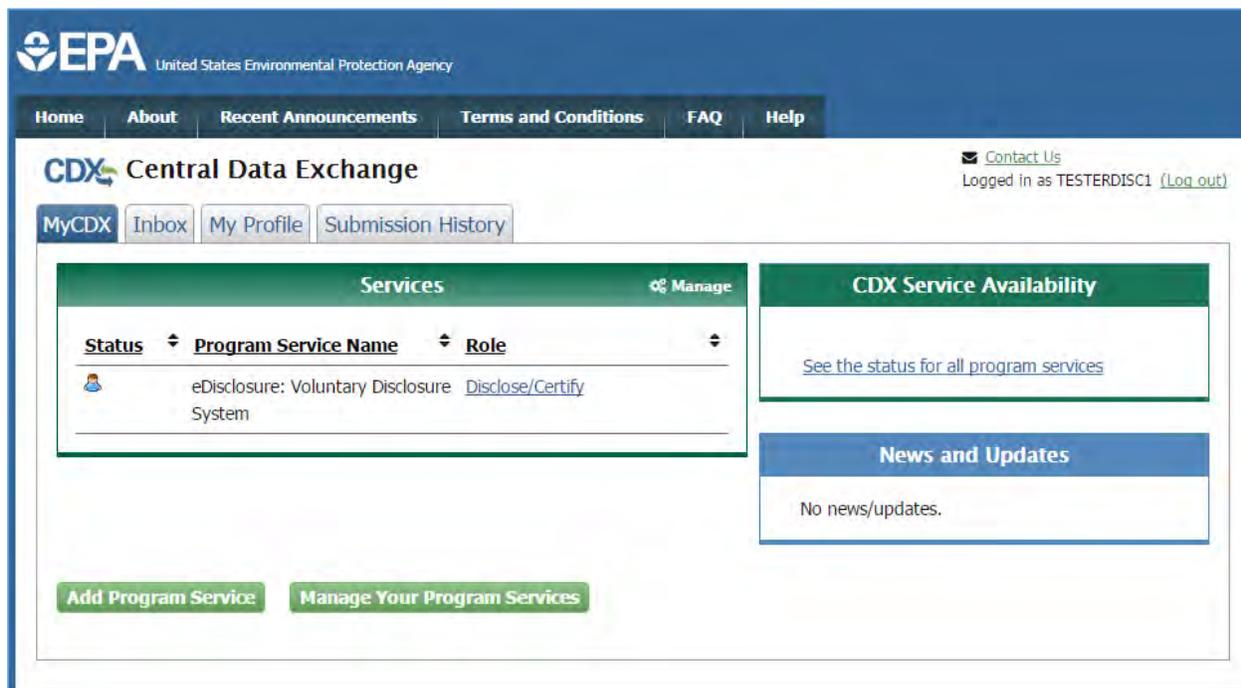


Figure 1-16 Signature Ceremony



At this point, your registration is complete. You will be taken to your MyCDX page where you will see the eDisclosure Program Service and role. You may now access your Disclose/Certify role by clicking on the hyperlink on your MyCDX page (Figure 1-17).

Figure 1-17 MyCDX Page

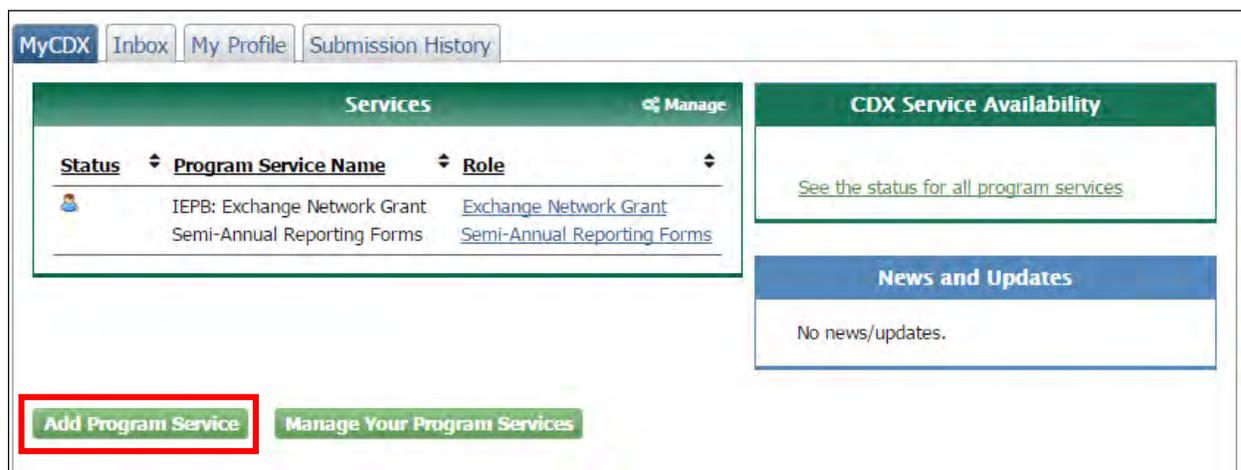


1.2. Adding a New Role

If you have an existing CDX account and have previously registered for other Program Services, you can add a new role to access eDisclosure.

Log in to your CDX account by entering your User ID and Password on the home page. On your MyCDX page click on the “Add Program Service” button as shown in Figure 1-18.

Figure 1-18 MyCDX Page-Add Program Service



You will be prompted to select a program service from the list as shown in Figure 1-19. You can select eDisclosure from the list of program services or type it in the text field.

Figure 1-19 Add Program Service List

The screenshot shows the EPA CDX 'Edit Account Profile' interface. At the top, the EPA logo and 'United States Environmental Protection Agency' are displayed. A navigation bar includes links for Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. The user is logged in as TESTERABC, with links for Contact Us and Log out. The account profile is divided into three steps: 1. Program Service (active), 2. Role Access, and 3. Organization Information. Below the steps, a text box prompts the user to begin typing a program service name or related keywords to filter the list of available services (e.g., air quality system, AQS, or Clean Air Act). The 'Active Program Services List' section contains a search input field with 'eD' entered. Below the search field is a list of program services, each in a separate box:

- ACRES: Assessment Cleanup and Redevelopment Exchange System
- CEDRI: Compliance and Emissions Data Reporting Interface
- CROMERRS: CROSS-Media Electronic Reporting Rule Services
- CSPP: Submissions for Chemical Safety and Pesticide Programs
- eDisclosure: Voluntary Disclosure System
- LEAD: Lead-Based Paint Program
- OTAQEMTS: Office of Transportation and Air Quality EPA Moderated Transaction System
- OTAQWaiverCredits: Cellulosic Biofuel Waiver Credits Pay.gov Application
- PSP: Pesticide Submission Portal

In the Role Access screen, select the Disclose/Certify role from the dropdown field and click on the “Request Role Access” button (Figure 1-20).

Figure 1-20 Select Role

The screenshot shows the 'Edit Account Profile' page with the following elements:

- Navigation menu: Home, About, Recent Announcements, Terms and Conditions, FAQ, Help.
- Page title: CDX Edit Account Profile.
- User info: Contact Us, Logged in as TESTERABC (Log out).
- Progress bar: 1. Program Service (checked), 2. Role Access (active), 3. Organization Information.
- Registration Information table:

Registration Information	
Program Service	Voluntary Disclosure System
Role	Not selected

Select a role from the drop down list and provide any required additional information, if applicable.

By clicking Request Role Access, you understand that you intend to disclose to the United States Environmental Protection Agency (EPA) potential violations of Federal Environmental Laws, regulations, and/or requirements. EPA will assess your disclosure and provide a notice of determination or acknowledgement letter in accordance with Audit Policy/ Small Business Compliance Policy.

Select Role:

Buttons: Request Role Access, Cancel

You will then be asked to select an organization. You can either select a current organization or request to add a different organization. Select the organization on whose behalf you are disclosing a violation. The organization may or may not be the same organization you are employed by. Once you have selected an organization, click on the “Submit Request for Access” button (Figure 1-21).

Figure 1-21 Select an Organization

CDX Edit Account Profile ✉ [Contact Us](#)
Logged in as TESTERABC ([Log out](#))

1. Program Service ✓ 2. Role Access ✓ 3. Organization Information

Registration Information	
Program Service	Voluntary Disclosure System
Role	Discloser/Certifier

Select a Current Organization
 Request to Add an Organization

Select an organization from the dropdown list.

Select the organization you are disclosing a violation on behalf of. The organization may or may not be the same organization you are employed by (i.e. if you are legal representation).

[Submit Request for Access](#)

If you have previously done Identity Proofing for the same organization with your CDX account, you will be routed directly to your MyCDX page and the eDisclosure Program Service and role will display in your list of services. You will not be able to access the “Disclose/Certify” hyperlink until EPA eDisclosure Management approves your role. Once approved, you will receive an email letting you know that your CDX role has been activated by EPA. You will now have access to your Disclose/Certify role by clicking on the hyperlink on your MyCDX page.

If you have previously done Identity-Proofing for a different organization with your CDX account, you will be routed directly to the Electronic CDX Electronic Signature Agreement page. You will need to sign a new ESA for the new organization, and your role will remain in a ‘Pending’ state until EPA eDisclosure Management approves your role. Once approved you will receive an email letting you know that your CDX role has been activated by EPA. You will now have access to your Disclose/Certify role by clicking on the hyperlink on your MyCDX page

If you have not done ID-Proofing for a previous role, the CDX Registration: Additional Verification Screen will display. On this screen you will have the choice to either sign a paper form by clicking on the sign the paper form hyperlink; or you may proceed with LexisNexis identity verification (Figure 1-22). Please note that when choosing the paper route you will still be able to start disclosing a violation, but should only be able to certify compliance until EPA has received a signed copy of the Paper CDX Electronic Signature Agreement (ESA). The address where the ESA must be sent to will be displayed on the paper form.

To proceed with LexisNexis verification, click on the checkbox and then the “Proceed to Verification” button as displayed in Figure 1-22. A pop-up window will display for you to enter

personal information and confirm your identity (Figure 1-23). Once you have completed the information click on the “Submit” button.

Figure 1-22 CDX Registration: Additional Verification

Home About Recent Announcements Terms and Conditions FAQ Help

CDX CDX Registration: Additional Verification [Contact Us](#)
Logged in as TESTABCD ([Log out](#))

1. Identity Verification > 2. Electronic Signature Agreement

The program you are registering for requires additional proof of identity. Your options are to use LexisNexis®, an independent 3rd-Party electronic identity proofing service or to print and submit a signed form through U.S. Postal Mail to the U.S. Environmental Protection Agency.

Note: By clicking [Proceed to Verification] you understand the service is voluntary and that you are validating personally identifying information including the last 4 digits of SSN against a 3rd-Party service LexisNexis®, which will return evidence of validation of your personally identifying information back to the U.S. Environmental Protection Agency. The U.S. EPA will not collect or retain sensitive, personally identifying information such as your Social Security Number (SSN); however, EPA will receive evidence of identity validation which may be used to identify you for legal purposes.

You may [sign the paper form](#) if you do not want to use the automatic verification process.

Note: You will receive a limited number of attempts to complete identity verification. Please review all personal information carefully prior to submitting. If you need to modify the personal information listed below, please contact the [CDX Help Desk](#).

First Name: Paulette
Last Name: Elvir

I have reviewed the name presented above and I would like to proceed with LexisNexis. [Additional LexisNexis Identity Proofing Guidance](#)

Figure 1-23 LexisNexis Identity Verification



The image shows a web form for LexisNexis identity verification. At the top left is the LexisNexis logo, a red sphere with a white dot. To its right is the text "LexisNexis" in black, followed by a vertical bar and "Verification for EPA" in red. Below this is a section titled "* Required Fields" in grey. Underneath is a sub-section titled "Authorized Representative" in black. The form contains several input fields: "Last Name *" with the value "Elvir", "First Name *" with the value "Paulette", and "Middle Name" which is empty. Below these is "SSN (Last 4) *" which is empty. Then "Home Address *" which is empty. Below that are "Home City *" (empty), "Home State *" (a dropdown menu showing "-- State --"), and "Home Zip *" (empty). At the bottom of the form are "Home Phone" (empty) and "Date of Birth *" (empty). To the right of the form are two red buttons: "Submit" and "Cancel". At the very bottom of the form is a footer in red text: "Copyright © 2015 LexisNexis. All rights Reserved. [Terms & Conditions](#) | [Privacy & Security](#)".

Once your identity has been verified via LexisNexis, you will be required to select five challenge questions and answers. Enter the required information and click on the “Save Answers” button as displayed in Figure 1-24. Please make note of your answers since they will be used during electronic signature process of the compliance certification.

Figure 1-24 Challenge Questions

Home About Recent Announcements Terms and Conditions FAQ Help

CDX Central Data Exchange [Contact Us](#)
Logged in as TESTABCD ([Log out](#))

CDX Registration: Additional Verification

1. Identity Verification ✓ 2. Electronic Signature Agreement

You are registered for a program that requires eSignature PIN Verification. Please select five (5) challenge questions and answers. The questions that you select should be questions that you can remember, but difficult for anyone else to guess.

Select 5 Challenge Questions and Answers

<input type="text"/>	<input type="text"/>

[Save Answers](#)

After your 5 Challenge Questions and Answers have been saved, you will be directed to the Electronic CDX Electronic Signature Agreement page, which is an agreement between yourself and CDX that will authorize your electronic signature. Once the ESA has been signed, you will be authorized to sign information for eDisclosure. Click the 'Sign Electronically' button in order to proceed as shown in Figure 1-25.

Figure 1-25 Electronic Signature Agreement Page

EPA United States Environmental Protection Agency

Home About Recent Announcements Terms and Conditions FAQ Help

CDX CDX Registration: Additional Verification [Contact Us](#)
Logged in as TESTERDISC1 ([Log out](#))

1. Identity Verification ✓ 2. Electronic Signature Agreement

Electronic CDX Electronic Signature Agreement

The CDX electronic signature agreement (ESA) is an agreement between yourself and CDX that will authorize your electronic signature. By signing the ESA you agree to adhere to the conditions listed on the agreement below. Once the ESA has been signed, you will be authorized to sign and/or encrypt information for your data flow. For any questions regarding the CDX ESA please contact the [CDX Help Desk](#).

U.S. Environmental Protection Agency ELECTRONIC SIGNATURE AGREEMENT

In accepting the electronic signature credential issued by the U.S. Environmental Protection Agency (EPA) to sign electronic documents submitted to EPA's Central Data Exchange (CDX), and as a representative for:

Electronic Signature Holder Company Information

Organization Name:	ABC
Address:	123 MAIN ST
City, State, Zip:	FAIRFAX, VA 22030
Province:	
Country:	US
Phone Number:	(703) 888-9996
E-mail Address:	paulette.elvir@cgifederal.com
Registrant's Name:	Mrs Paulette Elvir
CDX User Name:	TESTERDISC1

[Sign Electronically](#) [Cancel](#)

You will then be prompted to accept the electronic signature certification statement (Figure 1-26). After accepting, you will be prompted first for your CDX password, and then you will be asked to answer one of your secret questions. Once both have been provided correctly, you will be able to click the 'Sign' button as shown in Figure 1-27.

Figure 1-26 Certification Statement

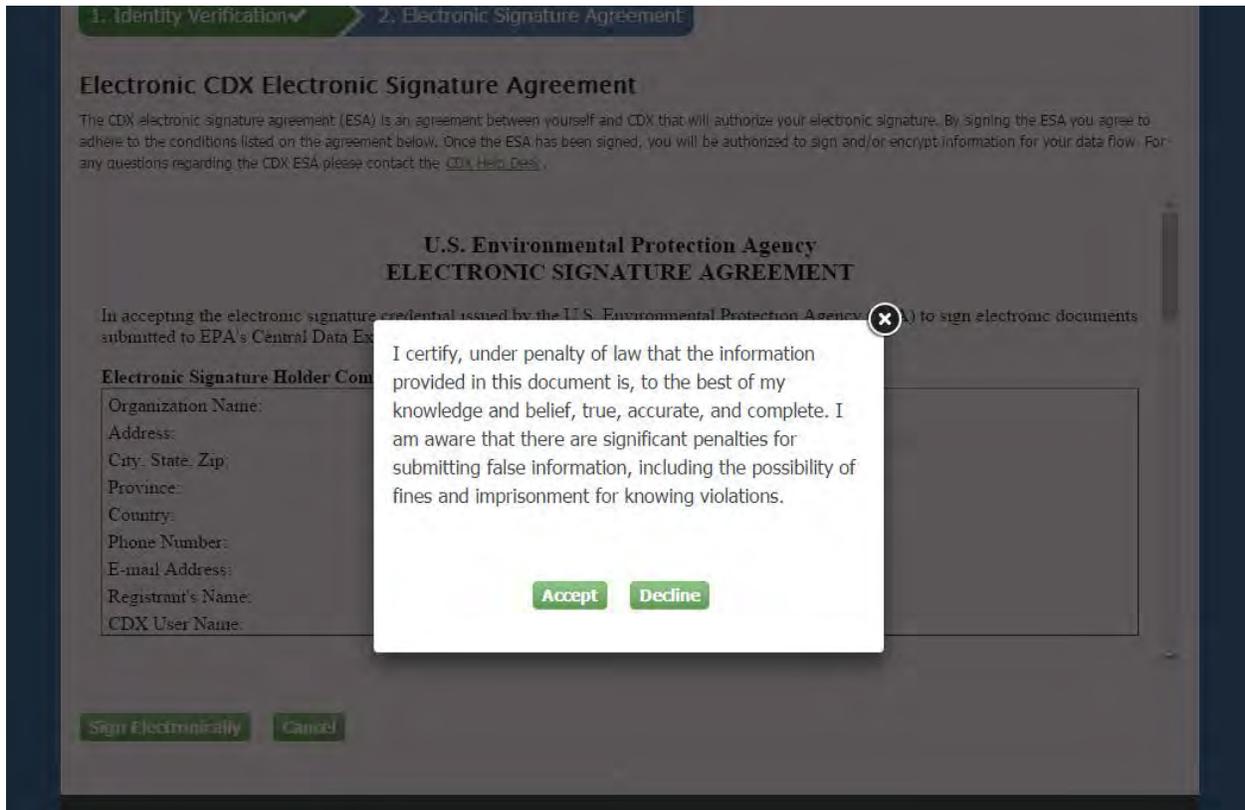
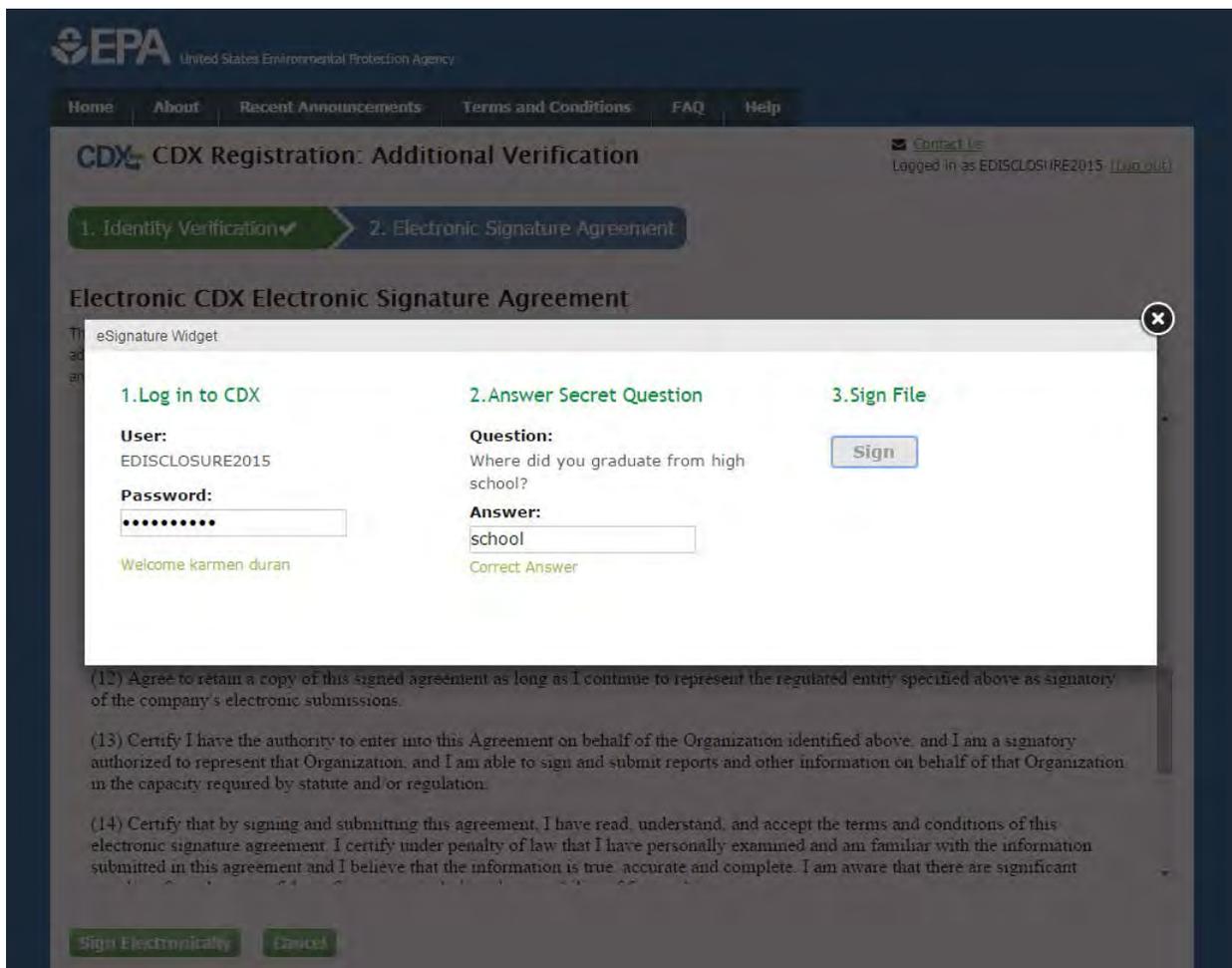


Figure 1-27 Signature Ceremony



At this point your registration is complete. You will be taken to your MyCDX page where you will see the eDisclosure Program Service and role. You will now access your Disclose/Certify role by clicking on the hyperlink on your MyCDX page (Figure 1-28).

Figure 1-28 MyCDX Page

The screenshot displays the MyCDX page within the Central Data Exchange (CDX) system. At the top, there is a navigation bar with links for Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. The CDX logo and name are prominently displayed. The user is logged in as TESTERABC, with a 'Log out' link and a 'Contact Us' link. Below the navigation, there are tabs for MyCDX, Inbox, My Profile, and Submission History. The main content area is divided into two columns. The left column features a 'Services' table with columns for Status, Program Service Name, and Role. The right column contains sections for 'CDX Service Availability' and 'News and Updates'. At the bottom, there are two buttons: 'Add Program Service' and 'Manage Your Program Services'.

Status	Program Service Name	Role
	eDisclosure: Voluntary Disclosure System	Disclose/Certify
	IEPB: Exchange Network Grant Semi-Annual Reporting Forms	Exchange Network Grant Semi-Annual Reporting Forms

2. eDisclosure Landing Page

To access the eDisclosure portal, click on the “Disclose/Certify” hyperlink on your MyCDX page. You will then be prompted to read a Warning Notice and User Agreement. Please read carefully and click on the “Proceed” button when ready (Figure 2-1). You will then be routed to the Violation Disclosure tab.

Figure 2-1 Warning Notice and User Agreement

MyCDX | Inbox | My Profile

You are here: [MyCDX](#) > Warning Notice and User Agreement

WARNING NOTICE AND USER AGREEMENT

In proceeding and accessing this U.S. Government eDisclosure system, you acknowledge that you fully understand and consent to all of the following:

1. This system allows regulated entities to disclose potential violations of federal environmental laws, regulations, and requirements, and may result in the issuance of an electronic Notice of Determination (eNOD) or Acknowledgement Letter (AL) pursuant to EPA's Audit Policy or Small Business Compliance Policy.
2. Any information entered onto this electronic system is voluntarily submitted and automatically becomes part of an enforcement investigation case file.
3. All information submitted must be truthful under penalty of law, and all such information will be retained by EPA and potentially could be publicly disclosed in response to requests under the Freedom of Information Act (FOIA) or for other lawful government purposes.
4. You are not submitting any confidential business information (CBI). EPA will consider any CBI claims to be waived if such information is uploaded onto this system.
5. You are not submitting other private information the disclosure of which would constitute an unwarranted invasion of any person's privacy (e.g., social security numbers, birth dates, medical records, personal financial information, or other private information).
6. If your disclosure requires the submission of such private or confidential business information, you must contact the eDisclosure [Help Desk](#) to arrange for secure transmittal of any necessary and appropriate information.

If you would like to view a short video describing how the eDisclosure system works, please click [here](#).

Proceed | [Exit](#)

2.1. Violation Disclosure Tab

The Violation Disclosure tab displays tables for both Open and Closed Violations. Open violations are those which have not yet reached resolution. Closed violations have completed the compliance certification and have reached resolution. If this is your first time opening the application, you will not see any disclosures in these tables. If you also wish to view disclosures that others have shared with you, please click on the Sharing tab at the top of the page.

Figure 2-2 Violation Disclosure Landing Page

The screenshot shows the EPA eDisclosure Violation Disclosure Landing Page. At the top, there is a navigation bar with tabs: MyCDX, Inbox, My Profile, Violation Disclosure (selected), Compliance Certification, Disclosure Search, Sharing, and Manage Facilities. A user is logged in as TESTERABC. Below the navigation, a breadcrumb trail reads "You are here: MyCDX > Open and Closed Disclosures".

The main content area contains introductory text and two buttons: "Disclose New Violations" and "Disclose Previously Disclosed EPCRA Violations". Below this is a section for "Open Disclosures" with an "Expand all" link and a table with one row:

Disclosure Name	Disclosure Initiation Date	Status	Available Actions
▶ Test ABC	12/07/15	In Progress - Disclosure(s) & Compliance Certification(s) Pending	Details

Below the "Open Disclosures" table is a section for "Closed Disclosures" with an "Expand all" link and a table showing "No Disclosures Found".

Click on the “Expand All” hyperlink to view more details for the disclosures listed in either table. This will display information on the facilities, statutes and sections reported for a specific violation (Figure 2-3).

Figure 2-3 Expand All

		Expand all	Collapse all	
Disclosure Name	Disclosure Initiation Date	Status	Available Actions	
▼ CGI_FEDERAL-115	08/01/2015	In Progress - Disclosure(s) & Compliance Certification(s) Pending	Details	
▼ Violation Group 1				
▼ A&B BROWN, INC.				
▼ Clean Water Act (CWA)				
311 Oil and Hazardous Substance Liability				
▼ CGI_FEDERAL-125	06/15/2015	Draft - No Disclosures Submitted	Details	
▼ Violation Group 1				
▼ A 1 AUTO PARTS				
▼ Clean Air Act (CAA)				
112B Asbestos				
112C Hazardous Air Pollutants				
▼ Violation Group 2				
▼ ACADIA CRAWFISH CHANGED				
▼ Clean Air Act (CAA)				
112H General Duty/Accidental Release				
114 Record keeping, Inspection, Information Request				
118 Control of Pollution from Federal Facilities				

Clicking on the “Details” hyperlink will take you to the details page for that specific violation disclosure.

Figure 2-4 Details Page

MyCDX
Inbox
My Profile
Violation Disclosure
Compliance Certification
Disclosure Search
Sharing
Manage Facilities

You are here: [MyCDX](#)» Violation Disclosure

Violation Disclosure

NOTE TO SUBMITTERS: Violations must be disclosed within 21 days of discovery. NOTE also that if you are seeking an electronic Notice of Determination (eNOD), you cannot add provisions to your list of EPCRA violations after the 21-day period has passed. Those seeking eNODs are strongly encouraged to list all possible EPCRA violations within 21 days and can withdraw any unnecessary provisions prior to certifying compliance (e.g., where further legal analyses indicates that no such violation of that provision actually occurred).

For a detailed how-to description of eDisclosure or for questions please visit the eDisclosure [Help Desk](#).

(* Indicates Required Fields)

Organization Point of Contact (POC) Information

First Name:	Paulette
Last Name:	Elvir
CDX User:	PAULETTE.ELVIR

Note that you can always return to the landing page by clicking on the “Violation Disclosure” tab.

2.2. Disclosure Search Tab

The Disclosure Search tab will allow the user to enter search criteria to access both open and closed violations that they have access to, or have been granted access to by another user.

Figure 2-5 Disclosure Search

The screenshot shows the 'Disclosure Search' tab selected in a navigation menu. Below the menu, a breadcrumb trail reads 'You are here: MyCDX >> Disclosure Search'. The main search area is titled 'Search' and contains the instruction: 'Specify search criteria below. If you do not enter any criteria, all violations will be listed.' The search criteria are organized into a table with labels on the left and input fields on the right:

Voluntary Disclosure Name	<input type="text"/>
Disclosure Submission Date	from <input type="text"/> - to <input type="text"/>
Facility Program Id	<input type="text"/>
Facility Registry Id	<input type="text"/>
Facility Name	<input type="text"/>
Disclosure Status	<input type="text" value="▼"/>
Statute	<input type="text" value="▼"/>
Statute Section	<input type="text" value="▼"/>

At the bottom left of the search area, there is a green 'Search' button and a 'Reset' link.

The search criterion includes the following:

- Voluntary Disclosure Name
- Disclosure Submission Date
- Facility Program ID
- Facility Registry ID
- Facility Name
- Disclosure Status
- Statute
- Statute Section

Click on the “Search” button to view the results. The “Reset” button will reset your selection and allows you to start a new search.

Search Results will be displayed in a grid as shown in Figure 2-6. Click on the “Details” hyperlink to view complete information for a specific violation disclosure.

Figure 2-6 Violation Search Results

MyCDX
Inbox
My Profile
Violation Disclosure
Compliance Certification
Disclosure Search
Sharing
Manage Facilities

You are here: [MyCDX](#)» Disclosure Search Results

Search Results

[Expand all](#) | [Collapse all](#) | [Back to search](#)

Disclosure Name	Disclosure Initiation Date	Status	Available Actions
* CE-127 Test	10/26/2015 10:39:17 AM	In Progress - Compliance Certification(s) Pending	Details
* Test ABC	10/14/2015 2:21:25 PM	In Progress - Disclosure(s) & Compliance Certification(s) Pending	Details
* Test CE-158	10/27/2015 2:34:59 PM	In Progress - Compliance Certification(s) Pending	Details

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[Accessibility](#)

CDX Help Desk: 888-890-1995 | (970) 494-5500 for callers from Puerto Rico and Guam



[About CDX](#)
[Frequently Asked Questions](#)
[Terms and Conditions](#)
[Contact Us](#)

3. Disclosing New Violations

To disclose new violations click on the “Disclose New Violations” button located in the top section of landing page as shown in Figure 3-1.

Figure 3-1 Disclose New Violations



The Violation Disclosure page will display as shown in Figure 3-2.

Figure 3-2 Disclose New Violations

MyCDX | [Intro](#) | [My Profile](#) | **Violation Disclosure** | [Compliance Certification](#) | [Disclosure Search](#) | [Sharing](#) | [Manage Facilities](#)

You are here: MyCDX > Violation Disclosure

Violation Disclosure

NOTE TO SUBMITTERS: Violations must be disclosed within 21 days of discovery. NOTE also that if you are seeking an electronic Notice of Determination (eNOD), you cannot add provisions to your list of EPCRA violations after the 21-day period has passed. Those seeking eNODs are strongly encouraged to list all possible EPCRA violations within 21 days and can withdraw any unnecessary provisions prior to certifying compliance (e.g., where further legal analyses indicates that no such violation of that provision actually occurred).

For a detailed how-to description of eDisclosure or for questions please visit the eDisclosure [Help Desk](#).

(* Indicates Required Fields)

Organization Point of Contact (POC) Information:

First Name: Paulette
Last Name: Elvir
CDX User: PAULETTE.ELVIR
Organization: CGI FEDERAL
Email Address: paulette.elvir@cgifederal.com
First Name: Paulette
Last Name: Elvir
CDX User: PAULETTE.ELVIR
Organization: CGI FEDERAL
Email Address: paulette.elvir@cgifederal.com
Phone Number: (703) 227-6281

Section 1: Voluntary Disclosure

Voluntary Disclosure Name:

Disclosure Status:

Disclosure Initiation Date:

*** Disclosure Policy:**

Section 2: Add Violation

*** Violation Discovery Date:**

Disclosure Group Name:

*** Select Facility:**

If no facilities are listed below, click on the green Manage Facilities button to add any needed facilities.

Select	Registry ID	Program ID	Facility Name	Facility Address
<input type="checkbox"/>	110043733715	ED15C85440	47-48 KAMEHAMEHA HIGHWAY	47-48 KAMEHAMEHA HIGHWAY KANEHOE HI, 96744
<input type="checkbox"/>	110020519134	ED15C85423	AMERICAN COLOR GRAPHICS INC	5101 S VALLEY INDUSTRIAL BLVD SHAKOPEE MN, 55379-1821
<input type="checkbox"/>	110085236351	ED15C85421	AMERICAN ENERGY RESTAURANT EQUIPMENT	7542 FULLERTON CT SPRINGFIELD VA, 22153
<input type="checkbox"/>	110057835545	ED15C85420	APPLIED SCIENCE AND TECHNOLOGY	9207 SHOTGUN COURT SPRINGFIELD VA, 22153
<input type="checkbox"/>	110024466004	ED15C85424	C & M ROCKS DAIRY	22400 NW 144TH AVE OKEECHOBEE FL, 34972
<input type="checkbox"/>	110090083351	ED15C85426	VINTAGE 2	684 HINDRY STREET, SUITE 777 CHESTER VA, 23836

[Manage Facilities](#)

*** Select Violations:**

CAA - Clean Air Act
 CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act
 CWA - Clean Water Act
 EPCRA - Emergency Planning and Community Right-to-Know Act
 FIFRA - Federal Insecticide, Fungicide, and Rodenticide Act
 MCRBMA - Mercury-Containing And Rechargeable Battery Management Act
 MFRSA - Marine Protection, Research and Sanctuaries Act (Ocean Dumping Act)
 RCRA - Resource Conservation and Recovery Act
 SDWA - Safe Drinking Water Act
 TSCA - Toxic Substances Control Act

[Save Violations](#)

Section 3: Submit

Listed below are disclosures that you can submit, withdraw, or for which you may certify compliance. If you wish to add potential violations to any of the Disclosure Groups below, click on the "Add Violation" hyperlink corresponding to the Disclosure Group that has the same discovery date as the violations that you are adding. If the added violations have a discovery date that is different than your disclosures listed below, you must add the violators in a new Disclosure Group in Section 2 above.

Select	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
<input type="checkbox"/>					

The Violation Disclosure screen includes several sections as follows:

1. Note to Submitters
2. Organization Point of Contact (POC) Information
3. Section 1: Voluntary Disclosure
4. Section 2: Add Violation
5. Section 3: Submit Disclosure

3.1. Note to Submitters and POC Information

The top section of the Violation Disclosure screen includes a note to submitters reminding them that violations must be disclosed within 21 days of discovery in order to qualify for penalty mitigation. A “Help Desk” link is available in case you need more information or have specific questions on eDisclosure.

The Organization Point of Contact (POC) section includes information you entered during the registration process as shown in Figure 3-3. This information is read-only and includes the following fields:

1. First Name
2. Last Name
3. CDX UserID
4. Organization: Remember this organization is the one you are disclosing on behalf of. The organization may or may not be the same organization you are employed by.
5. Email Address
6. Phone Number

Note: If users need to make updates to their first name last name email, they will need to contact the helpdesk.

Figure 3-3 Note to Submitters and POC Information

MyCDX	Inbox	My Profile	Violation Disclosure	Compliance Certification	Disclosure Search	Sharing	Manage Facilities
-------	-------	------------	-----------------------------	--------------------------	-------------------	---------	-------------------

You are here: [MyCDX](#)» Violation Disclosure

Violation Disclosure

NOTE TO SUBMITTERS: Violations must be disclosed within 21 days of discovery. NOTE also that if you are seeking an electronic Notice of Determination (eNOD), you cannot add provisions to your list of EPCRA violations after the 21-day period has passed. Those seeking eNODs are strongly encouraged to list all possible EPCRA violations within 21 days and can withdraw any unnecessary provisions prior to certifying compliance (e.g., where further legal analyses indicates that no such violation of that provision actually occurred).

For a detailed how-to description of eDisclosure or for questions please visit the eDisclosure [Help Desk](#).

(* Indicates Required Fields)

Organization Point of Contact (POC) Information	
First Name:	Paulette
Last Name:	Elvir
CDX User:	PAULETTE.ELVIR
Organization:	CGI FEDERAL
Email Address:	paulette.elvir@cgifederal.com
Phone Number:	(703) 227-6281

3.2. Section 1: Voluntary Disclosure

Section 1 captures general information on the violation disclosure as show in Figure 3-4. It includes the following fields:

1. Voluntary Disclosure Name: This is a text field where the user will enter a name for the corresponding violation disclosure. To allow users to easily retrieve the disclosure in the future, disclosers must assign a unique name to identify the disclosure and distinguish it from other disclosures made on behalf of the same entity. For example, disclosers may wish to include the name of the entity, facility, and/or legal requirements at issue (e.g., ABC Company-Smalltown Refinery-EPCRA 313).
2. Disclosure Status: This is a system generated status for the potential violation(s) the user has entered into eDisclosure. Only one of the following four status options will display:
 - a. **Unsaved Draft**: displays when a user initiates a disclosure and has not saved any violations.
 - b. **Draft-No Disclosure(s) Submitted**: violation(s) are in draft and have not been submitted by the user.
 - c. **In Progress – Disclosure(s) and Compliance Certification(s) Pending**: the user has disclosure(s) that have not been submitted, as well as disclosure(s) that have been submitted and have Compliance Certification(s) pending.
 - d. **In Progress – Compliance Certification(s) Pending**: all disclosures have been submitted and have Compliance Certification(s) pending for one or more of the submitted disclosures.
3. Disclosure Initiation Date: This is a system generated date corresponding to when the user first began to input data into eDisclosure information about potential violations.
4. Disclosure Policy: A discloser of potential violation must select the incentive policy under which it seeks penalty mitigation. The field has a dropdown with the following two options:
 - a. Audit Policy
 - b. Small Business Compliance Policy

Note that each field has a “?” symbol that includes help text that provides information on the corresponding fields. Click on the “?” symbol to view the help text (Figure 3-4).

Figure 3-4 Section 1: Voluntary Disclosure

Section 1: Voluntary Disclosure	
Voluntary Disclosure Name:	<input type="text"/> ?
Disclosure Status:	In Progress - Disclosure(s) & Compliance Certification(s) Pending ?
Disclosure Initiation Date:	9/1/2015 ?
* Disclosure Policy:	-- Please Select Policy -- ?

3.3. Section 2: Add Violation

Section 2 allows the user to enter detailed information on a specific violation disclosure. It includes fields that will capture the violation discovery date, facilities and section and statutes that may have been violated as displayed in Figure 3-5. Fields in Section 2 include help text made available by clicking on the “?” symbol.

Figure 3-5 Section 2: Add Violation

Section 2: Add Violation

*** Violation Discovery Date:** ?

Disclosure Group Name: ? Disclosure Group 2

*** Select Facility:** ?

If no facilities are listed below, click on the green Manage Facilities button to add any needed facilities.

Select	Registry ID	Program ID	Facility Name	Facility Address
<input type="checkbox"/>	110020519134	EDISC85423	AMERICAN COLOR GRAPHICS INC	5101 S VALLEY INDUSTRIAL BLVD SHAKOPEE MN, 55379-1821
<input type="checkbox"/>	110005236351	EDISC85421	AMERICAN ENERGY RESTAURANT EQUIPMENT	7542 FULLERTON CT SPRINGFIELD VA, 22153
<input type="checkbox"/>	110057635545	EDISC85420	APPLIED SCIENCE AND TECHNOLOGY	9207 SHOTGUN COURT SPRINGFIELD VA, 22153
<input type="checkbox"/>	110090063351	EDISC85426	VINTAGE 2	654 HUNGRY STREET, SUITE 777 CHESTER VA, 23836

Manage Facilities ?

*** Select Violations:** ?

[Expand all](#) [Collapse all](#)

▶	CAA	Clean Air Act
▶	CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
▶	CWA	Clean Water Act
▶	EPCRA	Emergency Planning and Community Right-to-Know Act
▶	FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
▶	MCRBMA	Mercury-Containing And Rechargeable Battery Management Act
▶	MPRSA	Marine Protection, Research and Sanctuaries Act (Ocean Dumping Act)
▶	RCRA	Resource Conservation and Recovery Act
▶	SDWA	Safe Drinking Water Act
▶	TSCA	Toxic Substances Control Act

Save Violation ?

Follow these steps to add a violation in Section 2:

1. **Violation Discovery Date**: Enter the date on which the violation was discovered. In order to meet the prompt disclosure condition, disclosures must be made within 21 days of discovery. By clicking on the Violation Discovery Date box, a calendar will display, highlighting in green the discovery dates that would make a disclosure submitted today a prompt disclosure under EPA's Audit Policy or Small Business Compliance Policy. Note that if discovery occurred on the same day for all facilities and violations below, you may specify a single discovery date. If discovery dates vary for some violations, choose the appropriate discovery date for the selected violations and click "Save Violation" button then choose other discovery dates for other violations.
2. **Disclosure Group Name**: This is a system generated name for the group of violations the user is disclosing. Once you click on the "Save Violation" button, you have finished disclosing for a group. A new Disclosure Group Name automatically will be generated for the next set of violations. Note that the disclosure group has one same Violation Discovery Date.
3. **Select Facility**: Select one or more facilities for which the above Violation Discovery Date applies. You may select all facilities if all potential violation being disclosed were discovered on the same date (e.g., through the same audit). If a different Violation Discovery Date applies to some listed facilities, they cannot be combined in a single disclosure group and separate disclosure groups must be submitted. Click on the "Manage Facilities" button if you have not previously selected violations. See Section 3.3.1 for more information.
4. **Manage Facilities**: Users who wish to disclose potential violations at facilities not already listed on the page can add such facilities to the disclosure, provided the disclosed violations for such newly added facilities were discovered on the same Violation Discovery Date (e.g., in the same audit). If a different Violation Discovery Date applies to such additional facilities, they cannot be added to this disclosure group and a separate disclosure group must be initiated and submitted. See Section 3.3.1 for more information.
5. **Select Violations**: Click on the "Expand All" link to see the statutory list of provisions available in the table. Select each specific legal provision(s) that may have been violated at the facilities selected for the disclosure. When expanded, the table displays all available statutes and corresponding sections. You may select one or more by clicking on the checkboxes on the left side of the table as shown in Figure 3-6. Click on the "Collapse All" link to collapse the table when needed. Note that you can also expand individual sections by clicking on the arrow keys next to each Statute name.

Figure 3-6 Select Violations table

* Select Violations: ?

[Expand all](#) [Collapse all](#)

▼	CAA	Clean Air Act
<input type="checkbox"/>	110	Implementation Plan for National Primary and Secondary Ambient Air Quality Standards
<input type="checkbox"/>	111	New Source Performance Standards
<input type="checkbox"/>	112	Hazardous Air Pollutants
<input type="checkbox"/>	112B	Asbestos
<input type="checkbox"/>	112D	MACT Standards
<input type="checkbox"/>	112E	MACT Adoption Schedule
<input type="checkbox"/>	112G	Modification
<input type="checkbox"/>	112H	Work Practices
<input type="checkbox"/>	112I	Permits/Compliance Schedule
<input type="checkbox"/>	112K	Area Source MACT
<input type="checkbox"/>	112R	General Duty/Accidental Release
<input type="checkbox"/>	113A	Violation of Existing Administrative Order
<input type="checkbox"/>	114	Record keeping, Inspection, Information Request

6. **Save Violation:** Clicking on this button allows you to save in draft form the violation disclosure information that you have entered into the eDisclosure system for submission at a later time. NOTE: Clicking on this button will not submit the disclosure, and you must make sure to return to this disclosure and click on the Submit Selected Disclosures button within 21 days of discovery in order for the disclosure to be considered prompt under EPA's Audit Policy or Small Business Compliance Policy. Violation Disclosures that have been saved in draft form will display in the table in Section 3. Disclosures can only be submitted in Section 3 of the Violation Disclosure Form.

3.3.1.

Facilities Management

When clicking on the "Manage Facilities" button you will be routed to a Facilities Management screen as shown in Figure 3-7. The My Facilities tab will display all previously selected facilities.

Figure 3-7 Facilities Management

Facilities Management

The facilities list under the My Facilities tab are linked to the Organization Name that you selected when opening eDisclosure. If you do not see your facility, it may be due to your profile having multiple organizations, please ensure you have selected the correct organization. If you still don't see your facility list please use the Add Facilities tab. You will be able to search for a Facility ID by entering either an EPA Registry ID or a Program ID (TSCA, CEDRI, TRI, etc.).

[Return to Violation Disclosure](#)

My Facilities [Add Facilities](#)

Manage Facilities (4 facilities managed) [List View](#) | [Map View](#)

The facilities selected for this data flow and role are listed below. You may add facilities by clicking the 'Add Facilities' button or tab. The ability to edit a facility is available from the 'Facility Details' screen which is accessible by clicking the 'Details' link for a facility in the table view or by clicking the 'Details' button on the map view. Please note that facilities with insufficient location information may not appear on the map view.

EPA Registry ID 	Program ID 	Facility Name 	Facility Address 	
110020519134	EDISC85423	AMERICAN COLOR GRAPHICS INC	5101 S VALLEY INDUSTRIAL BLVD SHAKOPEE, MN 55379-1821 SCOTT	Details Remove
110005236351	EDISC85421	AMERICAN ENERGY RESTAURANT EQUIPMENT	7542 FULLERTON CT SPRINGFIELD, VA 22153 FAIRFAX	Details Remove
110057635545	EDISC85420	APPLIED SCIENCE AND TECHNOLOGY	9207 SHOTGUN COURT SPRINGFIELD, VA 22153 FAIRFAX 	Details Remove
110090063351	EDISC85426	VINTAGE 2	654 HUNGRY STREET, SUITE 777 CHESTER, VA 23836 CHESTERFIELD 	Details Remove

[Add Facilities](#)

You may add new facilities by clicking on the “Add Facilities” button or tab. Enter information for one or more fields as displayed in Figure 3-8 and click on the “Search Facilities” button. Select one or more facilities by clicking on the radio buttons and click on “Proceed with Selections” when ready. The selected facilities display in a table under the “Unsaved Facilities” tab as shown in Figure 3-9. Clicking the “Save Selected Facilities” button saves the facilities you have selected in the current session so they are available to you the next time you log in. The saved facilities will also display in Section 2 of the Violation Disclosure form.

Figure 3-8 Add Facilities

The screenshot shows a web interface with two tabs: 'My Facilities' and 'Add Facilities'. The 'Add Facilities' tab is active. Below the tabs is a section titled 'Find Existing Facility' with a back link '< Back to My Facilities'. A message states: 'Fill in at least two search criteria to improve search results.' The form contains the following fields: Facility ID, Facility Name, Facility Address, City, State (a dropdown menu), and ZIP Code. A green 'Search Facilities' button is located at the bottom left of the form area.

Figure 3-9 Save Selected Facilities

The screenshot shows a web interface with three tabs: 'My Facilities', 'Add Facilities', and 'Unsaved Facilities'. The 'Unsaved Facilities' tab is active. Below the tabs is a section titled 'Selected Facilities' with a back link '< Add Additional Facilities'. On the right side, there are links for 'List View' and 'Map View'. A message explains that clicking 'Save Selected Facilities' saves facilities for the next login and that facilities with insufficient location information may not appear on the map view. Below the message is a table with the following data:

EPA Registry ID	Program ID	Facility Name	Facility Address	
110057999698	Pending	AMBERTONE PRESS, INC.	7664-Q FULLERTON ROAD SPRINGFIELD, VA 22153 FAIRFAX	Details Remove

A green 'Save Selected Facilities' button is located at the bottom left of the table area.

The ability to edit a facility is available by clicking on the “Details” link for a facility in the table view or by clicking the “Details” button on the map view as shown in Figure 3-10.

Figure 3-10 Facility Details

Facilities Management

Return to Violation Disclosure

My Facilities
Add Facilities

Facility Details

[< Back to My Facilities](#)

EPA Registry ID 110057999698

Program ID EDISC84788

Program Acronym
CDX: eDisclosure - FRS: EDISC

Facility Name
AMBERTONE PRESS, INC.

Facility Address
7664-Q FULLERTON ROAD
SPRINGFIELD, VA 22153
FAIRFAX

Coordinates

Tribal Lands Layer

UNITED STATES

MEXICO

bing™

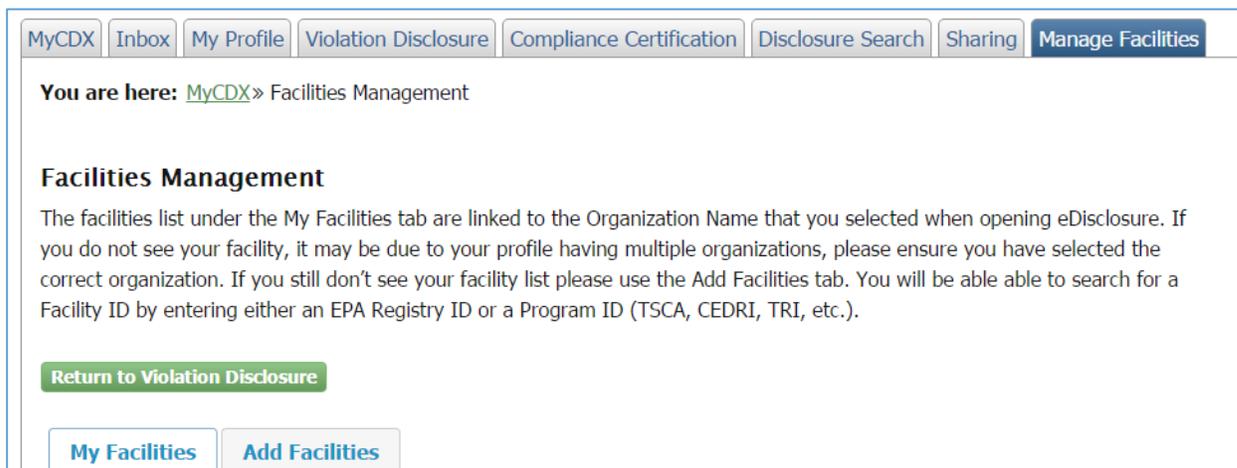
▶ Map Legend

Edit Facility

Note that you can go back to the Violation Disclosure form anytime by clicking on the “Return to Violation Disclosure” button available on all screens for Facilities Management.

The user can also manage facilities by clicking on the “Manage Facilities” tab on the top of the screen as displayed in Figure 3-11.

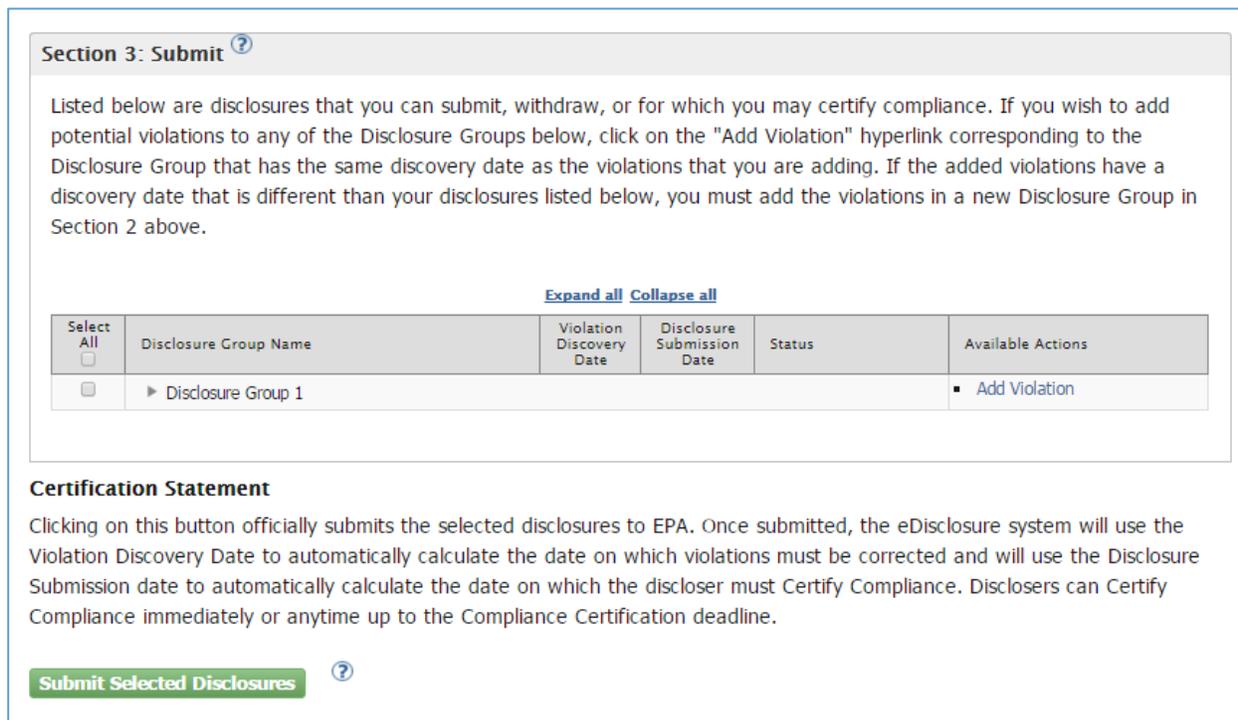
Figure 3-11 Manage Facilities Tab



3.4. Section 3: Submit Disclosure

Section 3 displays a table populated with the violations that have been entered in Section 2. The table can be expanded and collapsed by using the corresponding links on top of the table. You can also expand individual sections by clicking on the arrow keys next to each Group, Facility, Statute and Section name as shown in Figure 3-12.

Figure 3-12 Section 3: Submit Disclosure



The table includes the following columns:

1. Select All: This column includes checkboxes for each row in the table. You will be able to submit one or more disclosures at a time by using the checkboxes and clicking on the “Submit Selected Disclosures” button. You can also select a checkbox at the Group, Facility, Statute, or Section level to submit a complete disclosure group, a complete facility, a whole statute, or a whole section. Please note that the checkboxes in this column are for multiple disclosure submissions only and not for the “Available Actions” column. The actions for the corresponding group, facility, statute and section levels should be addressed individually.
2. Disclosure Group Name: This column includes the Disclosure Group Name that was system generated when disclosing and saving a group of violations. It also lists the facilities, statutes and sections for which the violations have been disclosed. You can use the arrow icons to expand or collapse the groups, facilities and statutes as needed.
3. Violation Discovery Date: This is the date entered in the “Discovery Date” field in Section 2.
4. Disclosure Submission Date: This is the date on which a section was submitted (when you clicked the “Submit Selected Disclosures” button). Several sections may display the same submittal date since you can submit multiple sections by using the checkboxes in the “Select All” column.
5. Status: This column displays statuses corresponding to the sections listed in the table. The available statuses are as follows:
 - a. Disclosure Submittal Due Date (MM/DD/YY) [XX Days]: The disclosure has been saved but has not yet been submitted. The status displays the available time to submit the violation disclosure.
 - b. Compliance Certification Due Date (MM/DD/YY) [XX Days]: the disclosure has been submitted and is waiting on Compliance Certification. The status displays the available time frame to submit the Compliance Certification Form. The time frame will correspond to the available period for either the Audit Policy or Small Business Compliance Policy
 - c. Notice of Determination Issued (MM/DD/YY): This status indicates that the Compliance Certification has been submitted and a Notice of Determination was issued by the system. The status also displays the date the Notice of Determination was issued.
 - d. Acknowledgment Letter Issued (MM/DD/YY): This status indicates that the Compliance Certification has been submitted and an Acknowledgment Letter was

issued by the system. The status also displays the date the Acknowledgment Letter was issued.

- e. Withdrawn: No Violation (MM/DD/YY): This status displays when a disclosure has been withdrawn by the discloser before compliance certification is due. The user indicated there was no violation and opted to withdraw within the compliance certification due period. The status displays the date the violation was withdrawn by the user.
 - f. Ineligibility Letter Issued (MM/DD/YY): This status applies to one of the following situations:
 - The disclosure does not qualify for an electronic Notice of Determination (eNOD) or Acknowledgment Letter (AL) based on submitted Compliance Certification indicating not all conditions of applicable policy being met.
 - The deadline for certifying compliance for the disclosure has passed. The user failed to timely certify compliance and will not be eligible to receive an electronic Notice of Determination (eNOD) or Acknowledgment Letter (AL).
 - The entity failed to disclose within 21 days of discovery and will not be eligible to receive an electronic Notice of Determination (eNOD) or Acknowledgment Letter (AL).
6. Available Actions: This column displays actions that are available to the user at the group, facility, statute and section level. The available actions are:
- a. Add Violation: This hyperlink allows the user to add a violation to an existing group within the 21 day period from the violation discovery date. The hyperlink will no longer be available once the 21 day period has expired.
 - b. Revise Discovery Date: This hyperlink allows the user to modify the violation discovery date. A pop-up box will display to enter the new date. The hyperlink will only be available when no sections within the Disclosure Group have been submitted.
 - c. Withdraw Violation: When clicking on this hyperlink, the user will withdraw (or delete, if not yet submitted) a complete violation, including all facilities, statutes and sections. A pop-up box will display for the user to confirm the selected action.
 - d. Withdraw Facility: By selecting this hyperlink, the user will withdraw (or delete, if not yet submitted) all violations associated with the specific facility in a Disclosure Group. A pop-up box will display for the user to confirm the selected action.

- e. Withdraw Statute: This hyperlink allows the user to withdraw all violations associated with the specific statute in a Disclosure Group. A pop-up box will display for the user to confirm the selected action.
- f. Withdraw Section: When selecting this hyperlink, the user will withdraw (or delete, if not yet submitted) the violation associated with the specific section in this Disclosure Group only.
- g. Go to Compliance Certification Page: This hyperlink takes the user directly to the Compliance Certification form for the corresponding section. The user is able to go back to the form as many times as needed before submitting it. The information will be saved when clicking on the “Save for Later” button included on the Compliance Certification page.
- h. Request Correction Extension: This hyperlink routes to a new screen that allows the user to request both a short term extension (with no explanation required) and longer extensions where a justification is required. The available timeline will correspond to the disclosure policy involved. The Request Correction screen is discussed in detail in Section 4, Requesting Correction Extensions.
- i. View Notice of Determination: This hyperlink opens a copy of the Notice of Determination issued by the system.
- j. View Acknowledgment Letter: This hyperlink opens a copy of the Acknowledgment Letter issued by the system.
- k. View Ineligibility Letter: This hyperlink opens a copy of the Ineligibility Letter issued by the system.

The lower part of Section 3 includes a Certification Statement. Please read it carefully before submitting and clicking on the “Submit Selected Disclosures” button.

You will be able to submit one or more disclosures at a time by using the checkboxes in the table under the “Select All Column”. Select one or more disclosures and click on the “Submit Selected Disclosures” button. You can also select a checkbox at the Group, Facility or Statute level to submit a complete disclosure group, a complete facility or a whole statute. When ready, click on the “Submit Selected Disclosures” button to submit your selections. Once the violations are submitted, the corresponding statuses are updated.

4. Requesting Correction Extensions

The eDisclosure portal allows disclosures to request correction extensions for both Audit Policy and Small Business Compliance Policy. The following sections list the steps to follow to request correction extensions and explains the different timelines for both disclosure policies.

4.1. Correction Extensions for Audit Policy Disclosures

To obtain an electronic Notice of Determination (eNOD), disclosers must correct their violations within 60 days of the date of discovery for those seeking penalty mitigation under the Audit Policy.

Category 2 disclosers seeking penalty mitigation under the Audit Policy can make an online request to correct their violations within 30 days. Correction extension requests within 30 days do not require the discloser to provide an extension justification.

Category 2 disclosers seeking penalty mitigation under the Audit Policy can also make an online request for more than 30 additional days to correct their violations, provided the violation correction date does not extend beyond 180 days after the date of discovery. To make such a request for an extension of more than 30 days, disclosers must include in the eDisclosure system a justification for such extension.

Upon such request, the eDisclosure system will automatically extend the Compliance Certification Report due date by an amount equal to the correction period extension, but the request is not considered granted or denied at the time of the request.

EPA is more likely to scrutinize requests for extension beyond 30 additional days and ultimately may decide that correction was not prompt, if and when it considers taking an enforcement action for environmental violations.

To request an extension, navigate to Section of the Violation Disclosure and determine the section for which you will be requesting the extension. Extensions can only be requested at the law section level. In the “Available Actions” column, click on the “Request Correction” hyperlink as shown in Figure 4-1.

Figure 4-1 Request Correction Extension Hyperlink

Select All <input type="checkbox"/>	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
	▼ Disclosure Group 1				<ul style="list-style-type: none"> ▪ Withdraw Group ▪ Add Violation
	▼ APPLIED SCIENCE AND TECHNOLOGY				<ul style="list-style-type: none"> ▪ Withdraw Facility
	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				<ul style="list-style-type: none"> ▪ Withdraw Statute
	303 Comprehensive Emergency Response Plans (Emergency Preparedness)	10/20/15	11/02/15	Compliance Certification Due 01/04/16 [63 Days]	<ul style="list-style-type: none"> ▪ Withdraw Section ▪ Go To Compliance Certification Page ▪ Request Correction Extension
	304 Emergency Release Notification Section 313 Program (Emergency Release Notification)	10/20/15	11/02/15	Compliance Certification Due 01/04/16 [63 Days]	<ul style="list-style-type: none"> ▪ Withdraw Section ▪ Go To Compliance Certification Page ▪ Request Correction Extension

The hyperlink will direct you to a Request Correction Extension page (Figure 4-2). The page includes the following sections:

- **Section 1: Violation Information:** This section displays information to the violation disclosure you have requested an extension for. Note that the extension correction request will not be active until you click on the “Request Extension” button on the bottom of the page.
- **Section 2: Extension History:** This section includes information on previous extensions you have requested for the violation disclosure displayed in Section 1. The table in this section provides details on the Extension Request Date, Extended Violation Correction Due Date and the Extended Compliance Certification Due Date. Extensions that include justification will display a checkmark in the “Justified extension” column. The “View Justification” column provides a “Details” hyperlink that will display detailed information on that specific justified extension request.
- **Section 3: Request Extension:** This is the section where you will enter specific details on the extension request. It displays the Current Violation Correction Due Date. Click on the “New Violation Correction Due Date” field to enter the extension correction date. A calendar widget displays allowing you to select a date. Once the date is selected the “New Compliance Certification Due” will display a date that is system generated. This is the new date on which the Compliance Certification is due. You will be able to select a date up to 180 days.
- **Section 4: Extension Justification:** This section will only display if the extension period you have selected is beyond 30 days from the initial compliance due date, and does not extend beyond 180 days. It includes a text box to enter justification comments.
- **Section 5: Add Attachments:** This section will only display if the extension period you have selected is beyond 30 days from the initial compliance due date, and does not extend

beyond 180 days. It allows the discloser to upload one or more attachments (any file format) with a total size limit of 50MB.

- Request Extension button: Click on this button when you are ready to submit the extension correction request. The system will generate both a pop-up message and an email confirmation with specific information on the requested extension.

Figure 4-2 Request Correction Extension Page

MyCDX
Inbox
My Profile
Violation Disclosure
Compliance Certification
Disclosure Search
Sharing
Manage Facilities

You are here: [MyCDX](#)» Request Extension

Request Extension

On this page, you may request an extension of the Current Violation Correction Due Date for the violation(s) listed below. The "Status" column in Section 1 notes the current Compliance Certification Due date. Any extensions requested for the Current Violation Correction Due Date will automatically extend the Compliance Certification Due date by an equal number of days, except where a Compliance Certification Due Date falls on a weekend or federal holiday, in which case it will be due on the next business day. NOTE ALSO that any violations for which you request an extension will not be eligible to receive an electronic Notice of Determination (eNOD) in the eDisclosure system. Any violations subject to an extension may receive, at most, an Acknowledgement Letter in eDisclosure. If you are seeking an eNOD for eligible EPCRA violations, do not request an extension.

Section 1: Violation Information

Violation Group Name	Violation Discovery Date	Disclosure Submission Date	Status
Disclosure Group 1			
APPLIED SCIENCE AND TECHNOLOGY			
Emergency Planning and Community Right-to-Know Act (EPCRA)			
304 Emergency Release Notification Section 313 Program (Emergency Release Notification)	10/20/2015	11/2/2015	Compliance Certification Due 1/4/2016 (63 Days)

Section 2: Extension History ?

Justified Extension	Extension Request Date	Extended Violation Correction Due Date	Extended Compliance Certification Due Date	View Justification
No Extension History				

Section 3: Request Extension ?

Current Violation Correction Due Date: ? 12/20/2015

New Violation Correction Due Date: ?

New Compliance Certification Due Date: ?

Request Extension ?

4.2. Correction Extensions for Small Business Compliance Policy Disclosures

To obtain an electronic Notice of Determination (eNOD), disclosers must correct their violations within 90 days of the date of discovery for those seeking penalty mitigation under the Small Business Compliance Policy.

Category 2 disclosers seeking penalty mitigation under the Small Business Compliance Policy can make an online request to correct their violations within 90 days. Correction extension requests within 90 days do not require the discloser to provide an extension justification.

Category 2 disclosers seeking penalty mitigation under the Small Business Compliance Policy can also make an online request for more than 90 additional days to correct their violations, provided the violation correction date does not extend beyond 360 days after the date of discovery.

To make such a request for an extension of more than 90 days, disclosers must include in the eDisclosure system a justification for such extension.

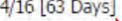
Extensions of more than 180 days after discovery must be based on the time needed to correct the violation(s) by putting into place pollution prevention measures.

Upon such request, the eDisclosure system will automatically extend the Compliance Certification due date by an amount equal to the correction period extension, but the request is not considered granted or denied at the time of the request.

EPA is more likely to scrutinize requests for extension beyond 90 additional days and ultimately may decide that correction was not prompt, if and when it considers taking an enforcement action for environmental violations.

To request an extension navigate to Section of the Violation Disclosure and determine the section you will be requesting the extension for. Extension can only be requested at the section level. In the "Available Actions" column, click on the "Request Correction" hyperlink as shown in Figure 4-3.

Figure 4-3 Request Correction Extension Hyperlink

Select All <input type="checkbox"/>	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
	▼ Disclosure Group 1				<ul style="list-style-type: none"> ▪ Withdraw Group ▪ Add Violation
	▼ APPLIED SCIENCE AND TECHNOLOGY				<ul style="list-style-type: none"> ▪ Withdraw Facility
	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				<ul style="list-style-type: none"> ▪ Withdraw Statute
	303 Comprehensive Emergency Response Plans (Emergency Preparedness)	10/20/15	11/02/15	Compliance Certification Due 01/04/16 [63 Days] 	<ul style="list-style-type: none"> ▪ Withdraw Section ▪ Go To Compliance Certification Page ▪ Request Correction Extension
	304 Emergency Release Notification Section 313 Program (Emergency Release Notification)	10/20/15	11/02/15	Compliance Certification Due 01/04/16 [63 Days] 	<ul style="list-style-type: none"> ▪ Withdraw Section ▪ Go To Compliance Certification Page ▪ Request Correction Extension

The hyperlink will direct you to a Request Correction Extension page (Figure 4-2). This page includes the same sections for both the Audit Policy and Small Business Compliance Policy. Please refer to section 4.1 Correction Extensions for Audit Policy Disclosures to see a detailed list and explanation of all sections.

Note that in the case of Small Business Compliance Policy, Section 4 (Extension Justification) and Section 5 (Add Attachments) will only display if the extension period you have selected is beyond 90 days from the initial compliance due date, and does not extend beyond 360 days.

5. Previously Disclosed EPCRA Violations

eDisclosure provides a 120-day window (after the system is launched) that allows you to enter previously disclosed EPCRA violations. These violations must have been disclosed to EPA before the launch of the eDisclosure portal. This functionality will only be available during the 120-day window and will no longer be active after the period expires.

To disclose these violations click on the “Disclose Previously Disclosed EPCRA Violations” button located above the Open Violations table on the landing page as shown in Figure 5-1.

Figure 5-1 Disclose Previously Disclosed EPCRA Violations



The screenshot shows the EPA eDisclosure portal interface. At the top, there is a navigation bar with tabs: MyCDX, Inbox, My Profile, Violation Disclosure (selected), Compliance Certification, Disclosure Search, Sharing, and Manage Facilities. Below the navigation bar, the page content includes:

- You are here:** [MyCDX](#)» Open and Closed Disclosures
- Text: "This page is where you can enter information about potential civil (but not criminal) violations of environmental law that you wish to voluntarily disclose to EPA and to view a listing of your open and closed disclosures. For more information about, or to edit, a disclosure, click on the Details hyper-link in the Available Actions column."
- Two buttons: "Disclose New Violations" and "Disclose Previously Disclosed EPCRA Violations". A red arrow points from the first button to the second. Both buttons have a question mark icon to their right.
- Text: "The Open Disclosures table below shows all of your open disclosures. Once Compliance Certifications are submitted for all violations in a Disclosure Group, it will no longer display in the Open Disclosures table. To view the details of any such closed disclosures, please see the Closed Disclosures table below or click [here](#) to do a search of your Closed Disclosures. If you also wish to view disclosures that others have shared with you, please click on the Sharing tab at the top of the page."
- A blue button labeled "Open Disclosures" at the bottom of the page content area.

The Previously Disclosed EPCRA Violations page will display as shown in Figure 5-2.

Figure 5-2 Disclose Previously Disclosed EPCRA Violations

MyCDX | Inbox | My Profile | **Violation Disclosure** | Compliance Certification | Disclosure Search | Sharing | Manage Facilities

You are here: MyCDX > Previous Violation Disclosure

Previous Violation Disclosure

NOTE TO SUBMITTERS: Previous disclosed EPCRA Violations must be submitted within 120 days after portal launch. The ability to do so will be removed from the system once the 120 days expire. [Help Desk](#).

(* Indicates Required Fields)

Organization Point of Contact (POC) Information

First Name: Paulette
Last Name: Elvir
CDX User: PAULETTE.ELVIR
Organization: CGI FEDERAL
Email Address: paulette.elvir@cgifederal.com
Phone Number: (703) 227-6281

Section 1: Voluntary Disclosure

Voluntary Disclosure Name:

Disclosure Status:

Disclosure Resubmission Initiation:

Disclosure Policy *:

Section 2: Add Violation

Violation Discovery Date *:

Disclosure Group Name:

Select Facility *:

Registry ID	Program ID	Facility Name	Facility Address
<input type="checkbox"/> 110043733715	EDISCR5440	47-48 KAMEHAMEHA HIGHWAY	47-48 KAMEHAMEHA HIGHWAY KANEHE HI, 96744
<input type="checkbox"/> 110020519134	EDISCR5423	AMERICAN COLOR GRAPHICS INC	5101 S VALLEY INDUSTRIAL BLVD SHAWOPEE MN, 55379-1621
<input type="checkbox"/> 110005236351	EDISCR5421	AMERICAN ENERGY RESTAURANT EQUIPMENT	7542 FULLERTON CT SPRINGFIELD VA, 22153
<input type="checkbox"/> 110057635545	EDISCR5420	APPLIED SCIENCE AND TECHNOLOGY	9207 SHOTGUN COURT SPRINGFIELD VA, 22153
<input type="checkbox"/> 110024466044	EDISCR5424	C & M RICKS DAIRY	23400 NW 144TH AVE OKEECHOBEE FL, 34972
<input type="checkbox"/> 110090033351	EDISCR5426	VINTAGE 2	654 HUNGRY STREET, SUITE 777 CHESTER VA, 23836

[Manage Facilities](#)

*** Select Violations:**

<input type="checkbox"/> EPCRA	Emergency Planning and Community Right-to-Know Act
<input type="checkbox"/> 302	Substances and Facilities Covered and Notification (Emergency Preparedness)
<input type="checkbox"/> 303	Comprehensive Emergency Response Plans (Emergency Preparedness)
<input type="checkbox"/> 311	Material Safety Data Sheets (MSDS) (Material Safety Data Sheets (MSDS))
<input type="checkbox"/> 312	Emergency and Hazardous Chemical Inventory Forms (Inventory of Chemicals)
<input type="checkbox"/> 313	Toxic Chemical Release Reporting (TRI) (Toxic Chemical Release Inventory (TRI))

[Save Violation](#)

Section 3: Submit Disclosure

Listed below are disclosures that you can submit, withdraw, or for which you may certify compliance. If you wish to add potential violations to any of the Disclosure Groups below, click on the "Add Violation" hyperlink corresponding to the Disclosure Group that has the same discovery date as the violations that you are adding. If the added violations have a discovery date that is different than your disclosures listed below, you must add the violations in a new Disclosure Group in Section 2 above.

Expand all Collapse all						
Select All	Disclosure Group Name	Violation Discovery Date	Original Disclosure Submission Date	Disclosure Resubmission Date	Status	Available Actions
<input type="checkbox"/>						

Section 4: Add Attachments

[Select Attachments...](#)

Document Name

The Violation Disclosure screen includes several sections as follows:

1. Note to Submitters
2. Organization Point of Contact (POC) Information
3. Section 1: Voluntary Disclosure
4. Section 2: Add Violation
5. Section 3: Submit Disclosure
6. Section 4: Attachments

5.1. Note to Submitters and POC Information

The top section of the Violation Disclosure screen includes a note to submitters reminding them that Previously Disclosed EPCRA Violations must be disclosed within 120 days of launch of the system. A “Help Desk” link is available in case you need more information or have specific questions on eDisclosure.

The Organization Point of Contact (POC) section includes information you entered during the registration process as shown in Figure 5-3. This information is read-only and includes the following fields:

1. First Name
2. Last Name
3. CDX UserID
4. Organization: Remember this organization is the one you are disclosing on behalf of. The organization may or may not be same organization you are employed by.
5. Email Address
6. Phone Number

Note: If users need to make updates to their first name last name email, they will need to contact the helpdesk.

Figure 5-3 Note to Submitters and POC Information

Previous Violation Disclosure

NOTE TO SUBMITTERS: Previous disclosed EPCRA Violations must be submitted within 120 days after portal launch. The ability to do so will be removed from the system once the 120 days expire. [Help Desk](#).

(* Indicates Required Fields)

Organization Point of Contact (POC) Information

First Name:	Paulette
Last Name:	Elvir
CDX User:	PAULETTE.ELVIR
Organization:	CGI FEDERAL
Email Address:	paulette.elvir@cgifederal.com
Phone Number:	(703) 227-6281

5.2. Section 1: Voluntary Disclosure

Section 1 captures general information on the violation disclosure as show in Figure 5-4. It includes the following fields:

1. Voluntary Disclosure Name: this a text field where the user will enter a name for the corresponding violation disclosure. To allow users to easily retrieve the disclosure in the future, disclosers must assign a unique name to identify the disclosure and distinguish it from other disclosures made on behalf of the same entity. For example, disclosers may wish to include the name of the entity, facility, and/or legal requirements at issue (e.g., ABC Company-Smalltown Refinery-EPCRA 313).
2. Disclosure Status: This is a system generated status for the potential violation(s) the user has entered into eDisclosure. Only one of the following four status options will display:
 - a. **Unsaved Draft**: displays when a user initiates a disclosure and has not saved any violations.
 - b. **Draft-No Disclosure(s) Submitted**: violation(s) are in draft and have not been submitted by the user.
 - c. **In Progress – Disclosure(s) and Compliance Certification(s) Pending**: the user has disclosure(s) that have not been submitted, as well as disclosure(s) that have been submitted and have Compliance Certification(s) pending.
 - d. **In Progress – Compliance Certification(s) Pending**: all disclosures have been submitted and have Compliance Certification(s) pending for one or more of the submitted disclosures.
3. Disclosure Resubmission Initiation Date: This is a system generated date corresponding to when the user first began to input data into eDisclosure information about potential violations.
4. Disclosure Policy: A discloser of potential violation must select the incentive policy under which it seeks penalty mitigation. The field has a dropdown with the following two options:
 - a. Audit Policy
 - b. Small Business Compliance Policy

Note that each field has a “?” symbol that includes help text that provides information on the corresponding fields. Click on the “?” symbol to view the help text.

Figure 5-4 Section 1: Voluntary Disclosure

Section 1: Voluntary Disclosure	
Voluntary Disclosure Name:	<input type="text" value="Test PD 001"/>
Disclosure Status:	<input type="text" value="Unsaved Draft"/>
Disclosure Resubmission Initiation :	<input type="text" value="9/18/2015"/>
Disclosure Policy *:	<input type="text" value="Audit Policy"/>

5.3. Section 2: Add Violation

Section 2 allows the user to enter detailed information on a specific previous EPCRA violation disclosure. It includes fields that will capture the violation discovery date, facilities and section and statutes that may have been violated as displayed in Figure 5-5. Fields in Section 2 include help text made available by clicking on the “?” symbol.

Figure 5-5 Section 2: Add Violation

Section 2: Add Violation

Violation Discovery Date *: ?

Disclosure Group Name: ? Disclosure Group 1

Select Facility *: ?
 If no facilities are listed below, click on the green Manage Facilities button to add any needed facilities.

	Registry ID	Program ID	Facility Name	Facility Address
<input type="checkbox"/>	110090134882	ESTAB89142	AAA RECYCLING INC.	12601 FAIR LAKES CIR FAIRFAX VA, 22033
<input type="checkbox"/>	110090149769	ESTAB89125	ABC CORP	963 HIGHLAND DR FAIRFAX VA, 22033

Manage Facilities ?

*** Select Violations:** ?

Select	Statute/Section ID	Section (Program)
	EPCRA	Emergency Planning and Community Right-to-Know Act
<input type="checkbox"/>	302	Substances and Facilities Covered and Notification (Emergency Preparedness)
<input type="checkbox"/>	303	Comprehensive Emergency Response Plans (Emergency Preparedness)
<input type="checkbox"/>	311	Material Safety Data Sheets (MSDS) (Material Safety Data Sheets (MSDS))
<input type="checkbox"/>	312	Emergency and Hazardous Chemical Inventory Forms (Inventory of Chemicals)
<input type="checkbox"/>	313	Toxic Chemical Release Reporting (TRI) (Toxics Chemical Release Inventory (TRI))

Save Violation ?

Follow these steps to add a violation in Section 2:

1. **Violation Discovery Date:** Enter the date the violation was discovered on. By clicking on the Violation Discovery Date box, a calendar will display.

Note that if discovery occurred on the same day for all facilities and violations below, you may specify a single discovery date. If discovery dates vary for some violations, choose the appropriate discovery date for the selected violations and then choose other discovery dates for other violations.

2. **Disclosure Group Name:** This is a system generated name for the group of violations the user is disclosing. Once you click on the “Save Violation” button, you have finished disclosing for a group. A new Disclosure Group Name will be automatically generated for the next set of violations. Note that the disclosure group has one same Violation Discovery Date.
3. **Select Facility:** Select one or more facilities for which the above Violation Discovery Date applies. You may select all facilities if all potential violation being disclosed were discovered on the same date (e.g., through the same audit). If a different Violation Discovery Date applies to some listed facilities they cannot be combined in a single disclosure and separate disclosure groups instead must be submitted. Click on the “Manage Facilities” button if you have not previously selected violations. See Section 5.3.1 for more information.
4. **Manage Facilities:** Users who wish to disclose potential violations at facilities not already listed on the page can add such facilities to the disclosure provided the disclosed violations for such newly added facilities were discovered on the same Violation Discovery Date (e.g., in the same audit). If a different Violation Discovery Date applies to such additional facilities, they cannot be added to this disclosure and a separate disclosure group instead must be initiated and submitted. See Section 5.3.1 for more information.
5. **Select Violations:** The table displays all available EPCRA sections. You may select one or more by clicking on the checkboxes on the left side of the table as shown in Figure 5-6.

Figure 5-6 Select Violations table

* Select Violations: ?		
<input type="checkbox"/>	EPCRA	Emergency Planning and Community Right-to-Know Act
<input type="checkbox"/>	302	Substances and Facilities Covered and Notification (Emergency Preparedness)
<input type="checkbox"/>	303	Comprehensive Emergency Response Plans (Emergency Preparedness)
<input type="checkbox"/>	311	Material Safety Data Sheets (MSDS) (Material Safety Data Sheets (MSDS))
<input type="checkbox"/>	312	Emergency and Hazardous Chemical Inventory Forms (Inventory of Chemicals)
<input type="checkbox"/>	313	Toxic Chemical Release Reporting (TRI) (Toxics Chemical Release Inventory (TRI))

6. **Save Violation:** Clicking on this button allows you to save in draft form the violation disclosure information that you have entered into the eDisclosure system for submission at a later time. NOTE: Clicking on this button will not submit the disclosure, and you must make sure to return to this disclosure and click on the Submit Selected Disclosures Violation Disclosures that have been saved in draft form will display in the table in Section 3. Disclosures can only be submitted in Section 3 of the Violation Disclosure Form.

5.3.1. Facilities Management

For more information on Facility Management please refer to the Facilities Management section discussed in Section 2: Add Violation for Disclosing New Violations.

5.4. Section 3: Submit Disclosure

Section 3 displays a table populated with the violations that have been entered in Section 2. The table can be expanded and collapsed by using the corresponding links on top of the table. You can also expand individual sections by clicking on the arrow keys next to each Group, Facility, Statute and Section name as displayed in Figure 5-12.

Figure 5-7 Section 3: Submit Disclosure

Section 3: Submit Disclosure ?

Listed below are disclosures that you can submit, withdraw, or for which you may certify compliance. If you wish to add potential violations to any of the Disclosure Groups below, click on the "Add Violation" hyperlink corresponding to the Disclosure Group that has the same discovery date as the violations that you are adding. If the added violations have a discovery date that is different than your disclosures listed below, you must add the violations in a new Disclosure Group in Section 2 above.

[Expand all](#) [Collapse all](#)

Select All	Disclosure Group Name	Violation Discovery Date	Original Disclosure Submission Date	Disclosure Resubmission Date	Status	Available Actions
<input type="checkbox"/>	▶ Disclosure Group 1					<ul style="list-style-type: none"> ▪ Add Violation ▪ Revise Discovery Date
<input type="checkbox"/>	▶ Disclosure Group 2					<ul style="list-style-type: none"> ▪ Add Violation ▪ Revise Discovery Date

The table includes the following columns:

1. **Select All:** This column includes checkboxes for each row in the table. You will be able to submit one or more disclosures at a time by using the checkboxes and clicking on the “Submit Selected Disclosures” button. You can also select a checkbox at the Group, Facility or Statute level to submit a complete disclosure group, a complete facility or a whole statute. Please note that the checkboxes in this column are for multiple disclosure submissions only and not for the “Available Actions” column. The actions for the corresponding group, facility, statute and section levels should be addressed individually.

2. Disclosure Group Name: This column includes the Disclosure Group Name that was system generated when disclosing and saving a group of violations. It also lists the facilities, statutes and sections for which the violations have been disclosed. You can use the arrow icons to expand or collapse the groups, facilities and statutes as needed.
3. Violation Discovery Date: This is the date entered in the “Discovery Date” field in Section 2.
4. Original Disclosure Submission Date: This is the date on which a section was submitted in paper form before access to the eDisclosure portal. Several sections may display the same submittal date since you can submit multiple sections by using the checkboxes in the “Select All” column. This is a required field and must be completed before submittal of a violation disclosure.
5. Status: This column displays statuses corresponding to the sections listed in the table. The available statuses are as follows:
 - a. Compliance Certification Due (MM/DD/YY) [XX Days]: The violation has been submitted and is waiting on Compliance Certification. The status displays the available time frame to submit the Compliance Certification Form. The time frame will be 30 days from disclosure re-submission date.
 - b. Notice of Determination Issued (MM/DD/YY): This status indicates that the Compliance Certification has been submitted and a Notice of Determination was issued by the system. The status also displays the date the Notice of Determination was issued.
 - c. Acknowledgment Letter Issued (MM/DD/YY): This status indicates that the Compliance Certification has been submitted and an Acknowledgment Letter was issued by the system. The status also displays the date the Acknowledgment Letter was issued.
 - Ineligibility Letter Issued (MM/DD/YY): This status indicates the deadline for certifying compliance for the disclosure has passed or that the submitted Compliance Certification indicated not all conditions of the applicable policy were met. The user failed to timely certify compliance or submitted a certification that indicated the applicable policy was not met and will not be eligible to receive an electronic Notice of Determination (eNOD) or Acknowledgment Letter (AL).

6. Available Actions: This column displays actions that are available to the user at the group, facility, statute and section level. The available actions are:
 - a. Add Violation: This hyperlink allows the user to add a violation to an existing group within the 21 day period from the violation discovery date. The hyperlink will no longer be available once the 21 day period has expired.
 - b. Revise Discovery Date: This hyperlink allows the user to modify the violation discovery date. A pop-up box will display to enter the new date. The hyperlink will only be available while no section in the Disclosure Group have been submitted.
 - c. Go to Compliance Certification Page: This hyperlink takes the user directly to the Compliance Certification Form for the corresponding section. The user is able to go back to the forms as many times as needed before submitting. The information will be saved when clicking on the “Save for Later” button included in the Compliance Certification Form.
 - d. View Notice of Determination: This hyperlink opens a copy of the Notice of Determination issued by the system.
 - e. View Acknowledgment Letter: This hyperlink opens a copy of the Acknowledgment Letter issued by the system.
 - f. View Ineligibility Letter: This hyperlink opens a copy of the Ineligibility Letter issued by the system.

5.5. Section 4: Attachments

This section allows you to attach support documentation. You must upload a copy of the violation disclosure you originally submitted to EPA. Click on the “Select Attachments” button to upload your files as shown in Figure 5-13. It allows the discloser to upload one or more attachments (any file format) with a total size limit of 50MB.

Figure 5-8 Section 4: Add Attachments



Document Name
Test file.docx

The lower part of Section 4 includes a Certification Statement. Please read carefully before submitting and clicking on the “Submit Selected Disclosures” button.

You will be able to submit one or more disclosures at a time by using the checkboxes in the table under the “Select All Column”. Select one or more and clicking on the “Submit Selected Disclosures” button. You can also select a checkbox at the Group, Facility or Section level to submit a complete disclosure group, a complete facility or a whole section. When ready, click on the “Submit Selected Disclosures” button to submit your selections. Once the violations are submitted the corresponding statuses are updated.

6. Add Violations

The Add Violation hyperlink displays in the “Available Actions” column in Section 3 of the Violation Disclosure form. By clicking on the hyperlink you will be able to add a facility and/or violations associated to the Disclosure Group only. A pop-up message displays confirming your action. Click on the “Ok” button to proceed.

You will be routed to a page similar to the violation disclosure page (see Figure 6-1). Section 2 displays violation information details on your current selections. Section 3: Add Violation, allows you to select a facility and to select new violations. Click on the “Add Violation” button to save your new selection(s). Confirm that the new selection(s) display in the table in Section 2. Click on the “Back” hyperlink next to the “Add Violation” button to return to the Violations Disclosure form.

The Add Violation hyperlink will only be available within the 21 day violation discovery page. After the 21 day period has expired, you will not be able to add new violations to an existing Disclosure Group.

Figure 6-1 Add Violation Page

MyCDX
Inbox
My Profile
Violation Disclosure
Compliance Certification
Disclosure Search
Sharing
Manage Facilities

You are here: [MyCDX](#)» Add Violation

Add Violation

Section 1: Violation Information

Violation Group Name: [?](#) Disclosure Group 1

Disclosure Name: [?](#) EPCRA Test Tutorial

Section 2: Violation Information details [?](#)

[Expand all](#) [Collapse all](#)

Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status
▼ Disclosure Group 1			
▼ APPLIED SCIENCE AND TECHNOLOGY			
▼ Emergency Planning and Community Right-to-Know Act (EPCRA)			
303 Comprehensive Emergency Response Plans (Emergency Preparedness)	10/20/15	11/02/15	Compliance Certification Due 01/04/16 [63 Days]
304 Emergency Release Notification Section 313 Program (Emergency Release Notification)	10/20/15	11/02/15	Compliance Certification Due 01/04/16 [63 Days]

Section 3: Add Violation

*** Violation Discovery Date:** [?](#) 10/20/2015

*** Select Facility:** [?](#)

Select	Registry ID	Program ID	Facility Name	Facility Address
<input type="checkbox"/>	110043733715	EDISC85440	47-48 KAMEHAMEHA HIGHWAY	47-48 KAMEHAMEHA HIGHWAY KANEOHE , 96744
<input type="checkbox"/>	110020519134	EDISC85423	AMERICAN COLOR GRAPHICS INC	5101 S VALLEY INDUSTRIAL BLVD SHAKOPEE , 55379-1821
<input type="checkbox"/>	110005236351	EDISC85421	AMERICAN ENERGY RESTAURANT EQUIPMENT	7542 FULLERTON CT SPRINGFIELD , 22153
<input type="checkbox"/>	110057635545	EDISC85420	APPLIED SCIENCE AND TECHNOLOGY	9207 SHOTGUN COURT SPRINGFIELD , 22153
<input type="checkbox"/>	110024466004	EDISC85424	C & M RUCKS DAIRY	22400 NW 144TH AVE OKEECHOBEE , 34972
<input type="checkbox"/>	110090063351	EDISC85426	VINTAGE 2	654 HUNGRY STREET, SUITE 777 CHESTER , 23836

[Manage Facilities](#) [?](#)

*** Select Violations:** [?](#)

[Expand all](#) [Collapse all](#)

▶	CAA	Clean Air Act
▶	CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
▶	CWA	Clean Water Act
▶	EPCRA	Emergency Planning and Community Right-to-Know Act
▶	FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
▶	MCRBMA	Mercury-Containing And Rechargeable Battery Management Act
▶	MPRSA	Marine Protection, Research and Sanctuaries Act (Ocean Dumping Act)
▶	RCRA	Resource Conservation and Recovery Act
▶	SDWA	Safe Drinking Water Act
▶	TSCA	Toxic Substances Control Act

Back
Add Violation
[?](#)

7. Withdraw Violations

The table in Section 3 of the Violation Disclosure page includes hyperlinks in the Available Actions column that allows you to withdraw a violation disclosure at the group, facility, statute or section level as shown in Figure 7-1.

Figure 7-1 Withdraw Violations

Expand all Collapse all					
Select All	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
<input type="checkbox"/>	▼ Disclosure Group 1				<ul style="list-style-type: none"> ▪ Withdraw Group ▪ Add Violation ▪ Revise Discovery Date
<input type="checkbox"/>	▼ AMERICAN ENERGY RESTAURANT EQUIPMENT				<ul style="list-style-type: none"> ▪ Withdraw Facility ▪ Withdraw Statute
<input type="checkbox"/>	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				
<input type="checkbox"/>	303 Comprehensive Emergency Response Plans (Emergency Preparedness)	10/27/15		Disclosure Submittal Due Date 11/17/15 [14 Days]	<ul style="list-style-type: none"> ▪ Withdraw Section
<input type="checkbox"/>	304 Emergency Release Notification Section 313 Program (Emergency Release Notification)	10/27/15		Disclosure Submittal Due Date 11/17/15 [14 Days]	<ul style="list-style-type: none"> ▪ Withdraw Section

When you click on the withdraw hyperlinks, a confirmation pop-up message displays asking the user to confirm or cancel the selection (Figure 7-2). The message will specify whether you are withdrawing a group, facility, statute or section level. Click “Yes, Continue Withdrawal” to proceed.

Figure 7-2 Withdraw Violations Confirmation Message

WARNING: By selecting this, you will withdraw (or delete, if not yet submitted) the selected section or statute. A record of any submitted but withdrawn disclosures will remain in the eDisclosure system but the eDisclosure system will not process such withdrawn items further. If you change your mind later, you will have to re-enter and submit the disclosure information prior to certifying compliance.

Are you sure you want to continue with this withdrawal?

Yes, Continue Withdrawal
No, Cancel Withdrawal

Note that if the violation disclosure has been saved but not submitted, the withdraw action will act as a delete and will permanently remove the information from the table. If the violation

disclosure has been submitted, then the withdraw action will change the status to “Withdrawn: No Violation [date]” as displayed in Figure 7-3.

Figure 7-3 Withdraw: No Violation Status

Section 3: Submit [?](#)

Listed below are disclosures that you can submit, withdraw, or for which you may certify compliance. If you wish to add potential violations to any of the Disclosure Groups below, click on the "Add Violation" hyperlink corresponding to the Disclosure Group that has the same discovery date as the violations that you are adding. If the added violations have a discovery date that is different than your disclosures listed below, you must add the violations in a new Disclosure Group in Section 2 above.

[Expand all](#) [Collapse all](#)

Select All <input type="checkbox"/>	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
	▼ Disclosure Group 1				
	▼ AMERICAN ENERGY RESTAURANT EQUIPMENT				
	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				
	303 Comprehensive Emergency Response Plans (Emergency Preparedness)	11/01/15	11/03/15	Withdrawn: No Violation 11/03/15	

8. Compliance Certification Forms

The discloser must submit a Compliance Certification form within 60 days of submitting the initial online disclosure for Audit Policy or 90 days for Small Business Compliance Policy.

The Compliance Certification form must identify the specific violations; certify that the violations have been corrected, and that the Audit Policy or Small Business Policy conditions have been met.

This 60- or 90-day compliance certification deadline is subject to limited reporting extensions that automatically apply when the violation correction deadline is extended (discussed in Section 4 Requesting Correction Extensions).

The 60- or 90-day compliance reporting deadline is different from the deadline to correct the violations:

- The violation correction deadline runs from the date violations are discovered.
- The compliance reporting deadline runs from the date violations are disclosed (which may be up to 21 days after discovery).

The eDisclosure portal includes different compliance certification forms based on the disclosure policy and whether the violation disclosure is EPCRA or non-EPCRA. The following sections will explain how to complete and submit the following types of certification forms:

1. Audit Policy-EPCRA Compliance Certification Form
2. Audit Policy-Non-EPCRA Compliance Certification Form
3. Small Business Compliance Policy-EPCRA Compliance Certification Form
4. Small Business Compliance Policy-non-EPCRA Compliance Certification Form

All compliance certification forms can be accessed from the Violation Disclosure page or the Compliance Certification tab. In the Violation Disclosure page, Navigate to Section 3 of the form and click on the “Go to Compliance Certification Page” hyperlink corresponding to the section for which you want to certify compliance as displayed in Figure 8-1. The compliance certification hyperlinks are only available for each specific law section. The hyperlink will direct you to the Compliance Certification form for that specific law section. Compliance Certification forms can also be accessed through the Compliance Certification tab as discussed in Section 8.5 Compliance Certification Tab.

Figure 8-1 Go to Compliance Certification Page Hyperlink

Expand all Collapse all					
Select All <input type="checkbox"/>	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
	▼ Disclosure Group 1				<ul style="list-style-type: none"> ▪ Withdraw Group ▪ Add Violation
	▼ AMERICAN COLOR GRAPHICS INC				<ul style="list-style-type: none"> ▪ Withdraw Facility
	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				<ul style="list-style-type: none"> ▪ Withdraw Statute
	302 Substances and Facilities Covered and Notification (Emergency Preparedness)	10/28/15	11/03/15	Compliance Certification Due 01/04/16 [62 Days]	<ul style="list-style-type: none"> ▪ Withdraw Section ▪ Go To Compliance Certification Page ▪ Request Correction Extension
	311 Material Safety Data Sheets (MSDS) (Material Safety Data Sheets (MSDS))	10/28/15	11/03/15	Compliance Certification Due 01/04/16 [62 Days]	<ul style="list-style-type: none"> ▪ Withdraw Section ▪ Go To Compliance Certification Page ▪ Request Correction Extension
	▼ Resource Conservation and Recovery Act (RCRA)				<ul style="list-style-type: none"> ▪ Withdraw Statute
	3002 Standards Applicable to Generators of Hazardous Waste (Gen Hazardous Waste Management - Subtitle C - CESQG)	10/28/15	11/03/15	Compliance Certification Due 01/04/16 [62 Days]	<ul style="list-style-type: none"> ▪ Withdraw Section ▪ Go To Compliance Certification Page ▪ Request Correction Extension

8.1. Audit Policy-EPCRA Compliance Certification Form

If you are disclosing an EPCRA violation pursuant to the Audit Policy, follow the steps in this section to complete the Compliance Certification form. The form also includes help text that provides additional information on how to complete the fields. Click on the “?” symbol to view the help text. There are three (3) different variations on the form depending on the section of EPCRA being disclosed. The following describes the information required for an EPCRA section 313 disclosure. Any difference will be highlighted within the descriptions.

Note: An auto-complete folder icon will display if you have entered information from previous forms. When you click on the  next to each field, a list of previously-entered data will display. You can select from the list by checking on the corresponding radio button and clicking on the “Select” button.

8.1.1. General Information

The General Information section of the EPCRA Audit Policy Compliance Certification Form captures general information related to the NAICS code and last environmental compliance certification as shown in Figure 8-2.

- a. Primary NAICS code for this facility: If you are a multi-establishment facility, use the NAICS code of the establishment that provides the most revenue for the entire site. If you are unfamiliar with NAICS codes and their assignment to a facility, or if you want to insure your facility is classified correctly, please refer to <http://www.naics.com/search/>.

In order to start a search, click on the “Select” button. The “Name” and “NAICS Code” fields will display. You can search for a specific code by entering information in one or both fields. Click on the “Find” button to display matching search results. From the search results, select the corresponding radio button and hit the “Select” button. Your selection will populate in the “Primary NAICS code of this facility” field.

Note: Search results will be restricted to 100 matching NAICS Codes. If more than 100 matching results are found, you will need to provide more stringent search criteria or search via the NAICS website.

- b. Date of last environmental compliance: Click on the dropdowns to make a selection. The dropdowns include “None” and “Unknown” options for cases where you cannot provide specific information.
- c. Last environmental compliance inspection was performed by: Enter data in the text field.
- d. Regulatory area covered by inspection: Enter data in the text field.

Figure 8-2 General Information

You cannot certify this submission until all fields are complete.

I. General Information

Click on the  next to each field to auto-complete with data entered in previous compliance certifications.

1. Primary NAICS code of this facility  

2. Date of last environmental compliance inspection by local, state or federal Agency:
 / /

3. Last environmental compliance inspection was performed by: 

4. Regulatory area covered by inspection: 

8.1.2. Specific Non-Compliance Information

The Specific Noncompliance Information section of the EPCRA Audit Policy Compliance Certification Form allows the certifier to describe one or more violations. The information needs to be provided as many times as applicable. Click on the “Add Violation” button to enter information for each violation as shown in Figure 8-3.

Figure 8-3 Specific Noncompliance Information

II. Specific Noncompliance Information

Describe the violation(s). (This information needs to be provided as many times as applicable. For example, each year of a multiple reporting year disclosure will have to be filled out separately.)

Once you click on Add Violation, a grouping of seven questions will display as shown in Figure 8-4. You will need to complete the fields as follows:

- Remove:** The Remove button allows you remove the grouping of violation questions and answers when needed.
- Reporting Year:** select a year from the dropdown (available for Sections 312 and 313, otherwise date noncompliance began and date returned to compliance are requested).
- Number of full time employees at this site:** Take the number of hours worked by all full-time, part-time, and contract employees, and anyone else who contributes to the functions of this facility. Enter the data in the text field.

- d. Physical location of the violation at the facility: Enter corresponding data in the text field.
- e. Violation Type: Select one of the following options from the dropdown (only applies to section 313):
 - Data Quality (Form A)
 - Data Quality (Form R)
 - Non-reporting (Form A)
 - Non-reporting (Form B)
 - Supplier Notification
 - Other
- f. Chemical Information: For each chemical that you are disclosing, specify the chemical name, its CAS (Chemical Abstract Society) number, and how much of that chemical was manufactured, processed or otherwise used (EPCRA §313) at the facility, in pounds, for the year in question. Refer to sections 8.1.2.1 and 8.1.2.2.
- g. Questions 6 and 7: To complete these fields you must click on the text boxes and enter data. You also have the option to add attachments as needed for each of these questions.

Figure 8-4 Add Violation Fields

Remove

1. Reporting Year 📄 ▾

2. Number of full time employees at this site during reporting year: ? 📄

3. Physical location of the violation at the facility: ? 📄

4. Violation type? ? ▾

5. Chemical Information, for each chemical you are disclosing for, specify the chemical name, its CAS (Chemical Abstract Society) number, and how much of that chemical was manufactured, processed or otherwise used (EPCRA §313) at the facility, in pounds, for the year in question. ?

Add Chemical

6. Provide the date and description of how the violation was corrected and how any harm was remediated. Attach documents supporting your actions. For example, include written confirmation from authorities that submittals (Tier II reports, Form R's) were received.

📄
+ Select Attachments...
?

7. Describe what steps were taken to prevent recurrence of the violation, and provide the date that those measures were implemented. If the measures have not yet been implemented, provide the implementation schedule setting forth the dates of the anticipated actions.

📄
+ Select Attachments...
?

8.1.2.1.

Add Chemical

In order to add a chemical to your violation, click on the “Add Chemical” button and a group of fields display. Note that the section includes a “Remove” button at the top for you to delete an added chemical when needed. If you select the Chemical radio button, you will see Section 1 as shown in Figure 8-5.

Figure 8-5 Add Chemical

Chemical Information Remove

Is this a chemical or mixture?

Chemical Mixture

SECTION 1. CHEMICAL

Use this button to search/find your chemical by CAS number.
?

Search

1.1 CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)

1.2 Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)

1.3 Trade or Generic Chemical Name (Important: Complete only if Part I, Section 2.1 of the Form R is checked "Yes". Generic Name must be structurally descriptive.)

Click on the “Search” button to search for a chemical by CAS number. Additional fields display to help you search for the chemical name (Figure 8-6). You can search for a chemical name by entering the name and/or the CAS Number. Click on the “Find” button when ready. A list of results displays. Click on the corresponding radio button and hit the “Select” button. Your selection will populate in fields 1.1 and 1.2 of “Section 1. Chemical”.

Figure 8-6 Section 1. Chemical Name Look-up tool

Use this button to search/find your chemical by CAS number.
?

Chemical Name and/or CAS Number
Find Cancel

METHYLENE BROMIDE (74-95-3)
 VINYL BROMIDE (593-60-2)

Select

Complete question "1.3 Trade or Generic Chemical Name" only if Part I, Section 2.1 of the Form R is checked "Yes".

Under Section 3. Activities and Uses of the Toxic Chemical indicate if the manufacture of the toxic chemical is a produce or import by clicking on the corresponding checkbox. Also select a checkbox in the rest of the questions in Section 3.

Under Section 4. Maximum Amount of the Toxic Chemical, enter a numeric and units value in the "Amount" field.

8.1.2.2.

Add Mixture

In order to add a chemical to your violation, click on the "Add Chemical" button and a group of fields display (figure 8-7). Note that the section includes a "Remove" button at the top for you to delete an added chemical when needed. If you select the Mixture radio button, you will see Section 2. Mixture Component Identity, where you will need to provide the chemical name provided by the supplier.

Under Section 3. Activities and Uses of the Toxic Chemical: Indicate if the manufacture of the toxic chemical is a produce or import by clicking on the corresponding checkbox. Also select a checkbox in the rest of the questions in Section 3.

Under Section 4. Maximum Amount of the Toxic Chemical: enter a numeric and unit value in the "Amount" field.

Figure 8-7 Mixture Sections

Chemical Information Remove

Is this a chemical or mixture?

Chemical Mixture

SECTION 2. MIXTURE COMPONENT IDENTITY

Trade or Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.)

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY

(Important: Check all that apply.)

Manufacture the toxic chemical:

- Produce Import

Process the toxic chemical:

- As a reactant
 As a formulation component
 As an article component
 Repackaging
 As an impurity

Otherwise use the toxic chemical:

- As a chemical processing aid
 As a manufacturing aid
 Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

Amount

8.1.3.

Audit Policy Conditions

The Audit Policy Conditions section (Figure 8-8) is for the user to indicate if all Audit Policy conditions have been met. This section lists a total of nine conditions. Please read the instructions for each question carefully and complete all conditions before submitting.

Figure 8-8 III. Audit Policy Conditions

III. Audit Policy Conditions

Condition 1: Systematic Discovery of the Violation through an Environmental Audit or a Compliance Management System * ?

The violation was discovered as part of an Environmental Audit. (Check each box that applies; all boxes must be checked to qualify as an audit.) *

- The audit was systematic; ?
- The audit was documented; ?
- The audit was periodic and future audits are scheduled; and ?
- The audit was part of an objective review. ?

Or, the violation was discovered as a result of a Compliance Management System (CMS.) (Check each box that applies; all boxes must be checked to qualify as a CMS.) *

- Compliance policies, standards and procedures that identify how employees and agents are to meet the requirements of laws, regulations, permits, enforceable agreements and other sources of authority for environmental requirements;
- Assignment of overall responsibility for overseeing compliance with policies, standards, and procedures, and assignment of specific responsibility for assuring compliance at each facility or operation;

8.1.4.

Saving and Submitting

Save for Later button: This button is located at the bottom of the Compliance Certification form (Figure 8-9). The “Save for Later” button allows you to save the form if you are not able to complete it in one session. You can access the form from the “Go To Compliance Certification Page” hyperlink in Section 3 of the Violation Disclosure form. You can save it as many times as needed before you are ready for submittal.

Figure 8-9 Save and Submit buttons



Review & Submit button: This button is located at the bottom of the Compliance Certification Page next to the “Save for Later” button. Click on the “Review & Submit” button when you are ready to certify compliance. Remember that all required fields must be populated before submitting. A warning message as shown in Figure 8-10 will display on top of the form if you try to submit without completing the form correctly. The message will include a list of the fields you have not completed.

Figure 8-10 Compliance Certification Warning Message

You cannot certify this submission until all fields are complete.

Please address the following error(s).

- **Primary NAICS code must be provided.**
- **Date of last environmental compliance inspection is required.**
- **Last environmental compliance inspection was performed by is required.**
- **Regulatory area covered by inspection is required.**

Once you fill out all fields and click on the “Review and Submit” button you will be routed to a read-only version of the form (Figure 8-11). This allows you to review it before submitting.

Figure 8-11 Read Only Compliance Certification Form

You are here: [MyCDX](#)» Review: EPCRA/313 Compliance Report for USDA FOREST SERVICE PLUMAS NATIONAL FOREST Facility [EPCRA Audit Policy]

EPCRA/313 Compliance Report for USDA FOREST SERVICE PLUMAS NATIONAL FOREST Facility [EPCRA Audit Policy]

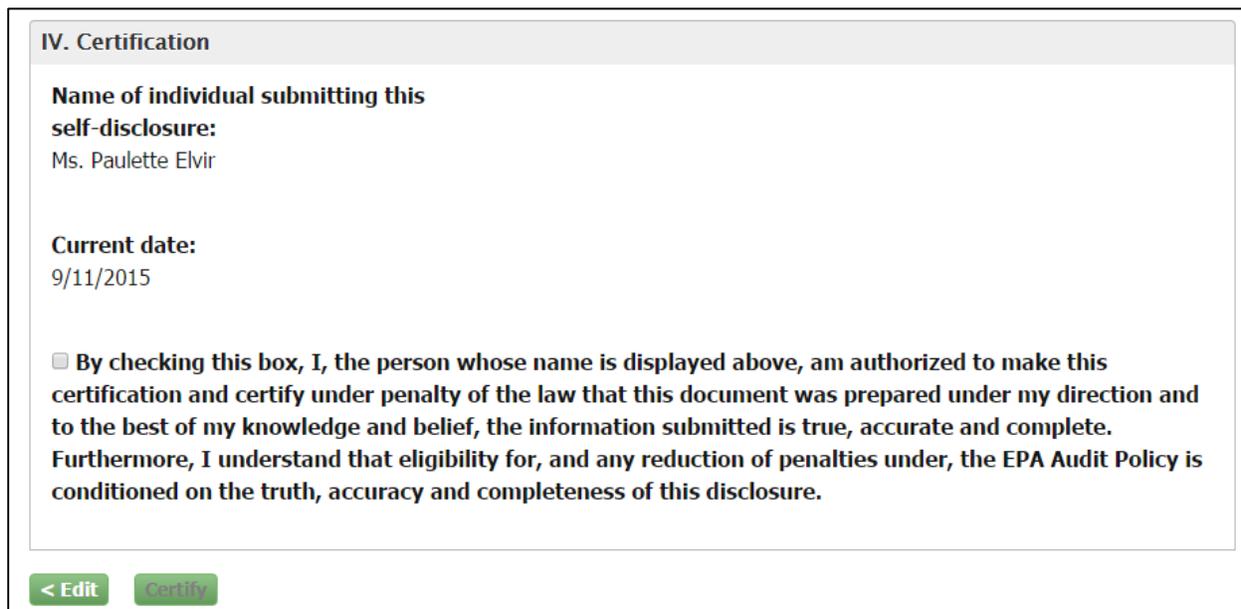
I. General Information

1. Primary NAICS code of this facility	Grapes, artificially drying
2. Date of last environmental compliance inspection by local, state or federal Agency:	Year: 2015; Month: January; Day: Unknown
3. Last environmental compliance inspection was performed by:	test
4. Regulatory area covered by inspection:	test

The bottom of the page has a Certification section. It has an “Edit” button that allows you to go back and make changes as needed before submitting.

Read the section carefully, and when you are ready to certify compliance, click the checkbox. The “Certify” button becomes active for you to click on, as shown in Figure 8-12.

Figure 8-12 Certification Section



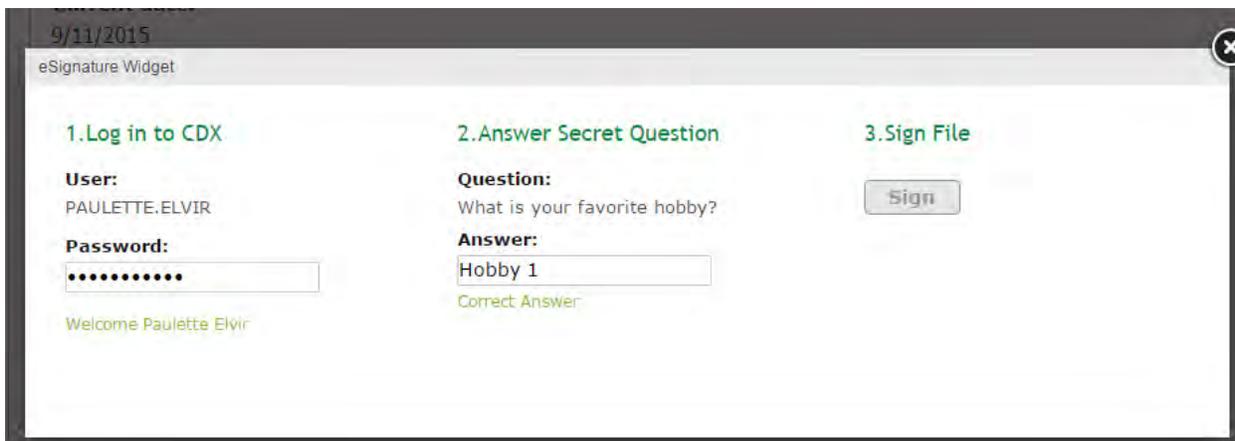
The screenshot shows a web form titled "IV. Certification". It contains the following fields and text:

- Name of individual submitting this self-disclosure:** Ms. Paulette Elvir
- Current date:** 9/11/2015
- A checkbox with the text: "By checking this box, I, the person whose name is displayed above, am authorized to make this certification and certify under penalty of the law that this document was prepared under my direction and to the best of my knowledge and belief, the information submitted is true, accurate and complete. Furthermore, I understand that eligibility for, and any reduction of penalties under, the EPA Audit Policy is conditioned on the truth, accuracy and completeness of this disclosure."
- At the bottom, there are two buttons: "< Edit" and "Certify".

An electronic signature widget displays on the screen (Figure 8-13). Enter the credentials you set up when registering with CDX. If you forgot your password you will be able to reset it by clicking on the “Forgot Password” hyperlink included in the certification section.

Enter your credentials and click on the “Sign” button.

Figure 8-13 eSignature Widget



The screenshot shows a window titled "eSignature Widget" with a close button in the top right corner. The date "9/11/2015" is displayed at the top left. The widget is divided into three columns:

- 1. Log in to CDX:** Includes fields for "User:" (PAULETTE.ELVIR) and "Password:" (masked with dots). A "Welcome Paulette Elvir" message is shown below.
- 2. Answer Secret Question:** Includes a "Question:" field with the text "What is your favorite hobby?" and an "Answer:" field with the text "Hobby 1". A "Correct Answer" message is shown below.
- 3. Sign File:** Includes a "Sign" button.

Once you sign, a certification confirmation screen displays as shown in Figure 8-14, indicating that the compliance certification form has been submitted. It includes general information on the form and the system's determination. It also provides a "View Report" button to access a read-only version of the submitted compliance certification form.

Figure 8-14 Certification Confirmation

MyCDX
Inbox
My Profile
Violation Disclosure
Compliance Certification
Disclosure Search
Sharing
Manage Facilities

You are here: [MyCDX](#)» Certified

Compliance Certification

Disclosure Name	AP Example
Policy	Audit Policy
Statute/Section	EPCRA / 313
Compliance Report ID	1085
CROMERR Activity ID	_1652e4ff-4954-45cc-ab0a-743e49ff1a68
Signature Date	11/5/2015

Thank you for certifying compliance. Based on the information that you submitted, the eDisclosure system is issuing a Notice of Determination (NOD) for the disclosed violation(s) and sending it to the e-mail address(es) that you registered in the eDisclosure system. If you do not receive such an e-mail within 1 hour, please contact the eDisclosure Help Desk. If you wish to view this NOD in the eDisclosure system, please [click here](#).

View Report

8.2. Audit Policy Non-EPCRA Compliance Certification Form

If you are disclosing a non-EPCRA violation pursuant to the Audit Policy, follow the steps in this section to complete the Compliance Certification form. Please note that you cannot certify the submission until all fields are complete. The form also includes help text that provides additional information on how to complete the fields. Click on the “?” symbol to view the help text.

8.2.1. General Information

The General Information section (Figure 8-15) of the Audit Policy Non-EPCRA Compliance Certification Form captures general information related to the NAICS code and last environmental compliance certification.

- a. Primary NAICS code for this facility: If you are a multi-establishment facility, use the NAICS code of the establishment that provides the most revenue for the entire site. If you are unfamiliar with NAICS codes and their assignment to a facility, or if you want to insure your facility is classified correctly please refer to <http://www.naics.com/search/>.

In order to start a search, click on the “Select” button. The “Name” and “NAICS Code” fields will display. You can search for a specific code by entering information in one or both fields. Click on the “Find” button to display matching search results. From the search results, select the corresponding radio button and hit the “Select” button. Your selection will populate in the “Primary NAICS code of this facility” field.

Note: Search results will be restricted to 100 matching NAICS Codes. If more than 100 matching results are found, you will need to provide more stringent search criteria or search via the NAICS website.

- b. Date of last environmental compliance: Click on the dropdowns to make a selection. The dropdowns include “None” and “Unknown” options for cases where you cannot provide specific information.
- c. Last environmental compliance inspection was performed by: Enter data in the text field.
- d. Regulatory area covered by inspection: Enter data in the text field.

Figure 8-15 General Information

CERCLA/122A Compliance Report [Audit Policy]

You cannot certify this submission until all fields are complete.

I. General Information

1. Primary NAICS code of this facility ?

Select

2. Date of last environmental compliance inspection by local, state or federal Agency:
 / /

3. Last environmental compliance inspection was performed by:

4. Regulatory area covered by inspection:

8.2.2. Specific Non-Compliance Information:

The Specific Non-Compliance Information section of the Non-EPCRA Audit Policy Compliance Certification form (Figure 8-16) allows the certifier to provide details for the violation. You will need to complete the fields as follows.

- a. Fields 1-5: These are all text fields. Click on the field to enter data. Fields 2 and 4 include help text that explain that you may include violations in statutory programs that were not part of your submitted disclosure, provided the information submitted on this Compliance Certification form also applies to any such newly added legal provisions.
- b. Dates in questions 6 and 7: A calendar widget displays when you click on the field. The calendar can go back months and years. You can either select a date from the calendar or enter a date following the mm/dd/yyyy format. Question 7 includes help text that includes a hyperlink to request an extension of the violation correction date. Clicking on the hyperlink will direct you to the request extension page for that specific compliance certification form.
- c. Chemical Information: You can provide information for each chemical/pollutant being disclosed. For more information see Section 8.2.2.1.
- d. Questions 9 and 10: To complete these fields you must click on the text boxes and enter data. You also have the option to add attachments as needed for each of these questions as shown in Figure 8-16.

Note: An auto-complete folder icon will display if you have entered information for previous forms. When you click on the icon, a list of previously entered data will display. You can select from the list by checking on the corresponding radio button and clicking on the "Select" button.

Figure 8-16 Specific Non-Compliance Information

II. Specific Noncompliance Information

Describe the violation(s). Click on the  next to each field to auto-complete with data entered in previous compliance certifications.

1. Nature and description of potential violation(s): 

2. Citation for the potential federal violation:  

[e.g., 40 CFR Part 112.3]

3. Regulatory citation for the state provisions where federally enforceable: 

4. Permit provisions where applicable:  

5. Physical location of the violation at the facility:  

6. Date noncompliance began: 

7. Date of return to compliance:  

8. Identity of Chemical/Pollutant Information, for each chemical/ pollutant you are disclosing for, specify the a.) chemical/pollutant name or trade name, CAS (Chemical Abstract Society) number, and b.) how much of that chemical/pollutant was involved, in pounds.

Add Chemical

9. Provide the date and description of how the violation was corrected and how any harm was remediated. If correction of the violation depends upon issuance of a permit that has been applied for but not issued by Federal, State, Local or Tribal authorities an entity may submit its compliance report without an issued permit (provided the maximum extension requests have been exhausted). Please describe the steps taken by the entity to ensure it submitted a timely complete permit application.

Attach documents supporting your actions. For example, include written confirmation from authorities that submittals (e.g., Notice of Intent (NOI), reports, etc.) were received.

 + Select Attachments... 

10. Describe what steps were taken to prevent recurrence of the violation and provide the date that those measures were implemented. If the measures have not yet been implemented, provide the implementation schedule setting forth the dates of the anticipated actions.

 + Select Attachments... 

Document Name

8.2.2.1.

Add Chemical

In order to add a chemical to your violation, click on the “Add Chemical” button and a group of fields display as shown in Figure 8-17. You can add multiple chemicals by clicking the “Add Chemical” button multiple times. Note that the section includes a “Remove” button at the top for you to delete an added chemical when needed.

Figure 8-17 Add Chemical

Chemical Information **Remove**

Use this button to search/find your chemical by CAS number.
 ?
Search

a.1) Provide the chemical name (or common name of the chemical) as provided on the MSDS:

a.2) CAS Number

b) Amount involved lbs.

Click on the “Search” button to search for a chemical by CAS number. Additional fields display to help you search for the chemical name as shown in Figure 8-18.

Figure 8-18 Chemical Name Look-up tool

Chemical Information **Remove**

Use this button to search/find your chemical by CAS number.
 ?

Chemical Name and/or CAS Number **Find** **Cancel**

Acetyl bromide (506-96-7)
 Bromide (24959-67-9)

Select

You can search for a chemical name by entering the name and/or the CAS Number. Click on the “Find” button when ready. A list of results displays. Click on the corresponding radio button and hit the “Select” button. Your selection will populate in fields “a.1)” and “a.2)”. Complete question “b)” Amount involved” by entering a numeric value in the field.

8.2.3.

Audit Policy Conditions

The Audit Policy Conditions section is for you to indicate if all Audit Policy conditions have been met (Figure 8-19). This section lists a total of nine conditions. Please read the instructions for each question carefully and complete all conditions before submitting.

Figure 8-19 Audit Policy Conditions

III. Audit Policy Conditions

Condition 1: Systematic Discovery of the Violation through an Environmental Audit or a Compliance Management System * ?

The violation was discovered as part of an Environmental Audit. (Check each box that applies; all boxes must be checked to qualify as an audit.) *

- The audit was systematic; ?
- The audit was documented; ?
- The audit was periodic and future audits are scheduled; and ?
- The audit was part of an objective review. ?

Or, the violation was discovered as a result of a Compliance Management System (CMS.) (Check each box that applies; all boxes must be checked to qualify as a CMS.) *

- Compliance policies, standards and procedures that identify how employees and agents are to meet the requirements of laws, regulations, permits, enforceable agreements and other sources of authority for environmental requirements;
- Assignment of overall responsibility for overseeing compliance with policies, standards, and procedures, and assignment of specific responsibility for assuring compliance at each facility or operation;

8.2.4.

Saving and Submitting

Save for Later button: This button is located at the bottom of the Compliance Certification form as shown in Figure 8-20. The “Save for Later” button allows you to save the form if you are not able to complete it in one session. You can access the form from the “Go To Compliance Certification Page” hyperlink in Section 3 of the Violation Disclosure form. You can save it as many times as needed before you are ready for submittal.

Figure 8-20 Save and Submit buttons



Review & Submit button: This button is located at the bottom of the Compliance Certification Page next to the “Save for Later” button. Click on the “Review & Submit” button when you are ready to certify compliance. Remember that all required fields must be populated before submitting. A warning message will display on top of the form if you try to submit it without completing the form correctly (Figure 8-21).

Figure 8-21 Compliance Certification Warning Message

You cannot certify this submission until all fields are complete.

Please address the following error(s).

- **Primary NAICS code must be provided.**
- **Date of last environmental compliance inspection is required.**
- **Last environmental compliance inspection was performed by is required.**
- **Regulatory area covered by inspection is required.**

Once you fill out all fields and click on the “Review and Submit” button, you will be routed to a read-only version of the form (Figure 8-22). This allows you to review before submitting.

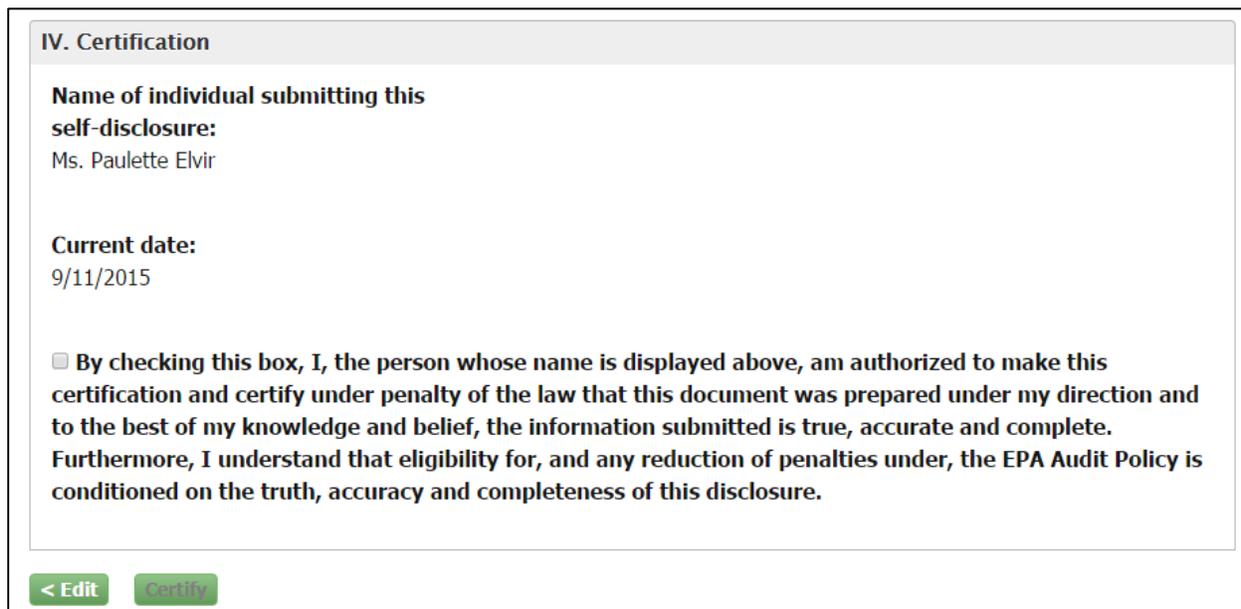
Figure 8-22 Read Only Compliance Certification Form

CERCLA/122L Compliance Report [Audit Policy]	
I. General Information	
1. Primary NAICS code of this facility	Brewers' and distillers' flakes and grits, corn, manufacturing
2. Date of last environmental compliance inspection by local, state or federal Agency:	Year: 2013; Month: October; Day: 14
3. Last environmental compliance inspection was performed by:	John Jones
4. Regulatory area covered by inspection:	Area 1

The bottom of the page has a Certification section (Figure 8-23). It has an “Edit” button that allows you to go back and make changes as needed before submitting.

Read the section carefully, and when you are ready to certify compliance click on the checkbox. The “Certify” button becomes active for you to click on it.

Figure 8-23 Certification Section



IV. Certification

Name of individual submitting this self-disclosure:
Ms. Paulette Elvir

Current date:
9/11/2015

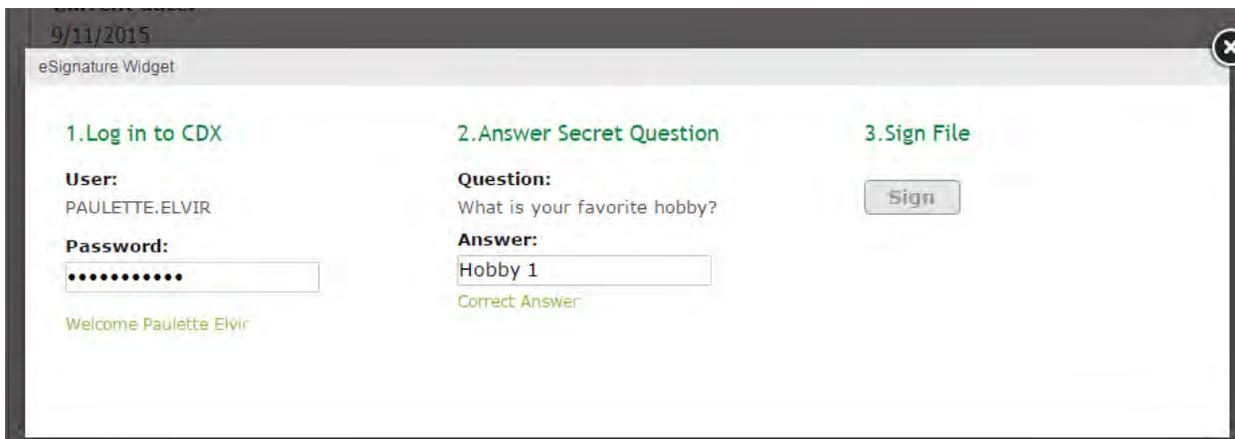
By checking this box, I, the person whose name is displayed above, am authorized to make this certification and certify under penalty of the law that this document was prepared under my direction and to the best of my knowledge and belief, the information submitted is true, accurate and complete. Furthermore, I understand that eligibility for, and any reduction of penalties under, the EPA Audit Policy is conditioned on the truth, accuracy and completeness of this disclosure.

[< Edit](#) [Certify](#)

An electronic signature widget displays on the screen as shown in Figure 8-21. Enter the credentials you set up when registering with CDX. If you forgot your password you will be able to reset by clicking on the “Forgot Password” hyperlink included in the certification section.

Enter your credentials and click on the “Sign” button.

Figure 8-24 eSignature Widget



9/11/2015

eSignature Widget

1. Log in to CDX

User:
PAULETTE.ELVIR

Password:
••••••••

Welcome Paulette Elvir

2. Answer Secret Question

Question:
What is your favorite hobby?

Answer:
Hobby 1

Correct Answer

3. Sign File

[Sign](#)

Once you sign, a certification confirmation screen displays (Figure 8-25) indicating that the compliance certification form has been submitted. It includes general information on the form and the system's determination. It also provides a "View Report" button to access a read only version of the submitted compliance certification form.

Figure 8-25 Certification Confirmation

MyCDX
Inbox
My Profile
Violation Disclosure
Compliance Certification
Disclosure Search
Sharing
Manage Facilities

You are here: [MyCDX](#)» Certified

Compliance Certification

Disclosure Name	AP Example
Policy	Audit Policy
Statute/Section	CERCLA / 122L
Compliance Report ID	1086
CROMERR Activity ID	_cb418c5e-33d0-451a-a5b4-4da8731dc682
Signature Date	11/5/2015

Thank you for certifying compliance. Based on the information that you submitted, the eDisclosure system is issuing an Acknowledgement Letter for the disclosed violation(s) and sending it to the e-mail address(es) that you registered in the eDisclosure system. If you do not receive such an e-mail within 1 hours, please contact the eDisclosure Help Desk. If you wish to view this Acknowledgement Letter in the eDisclosure system, please [click here](#).

View Report

8.3. Small Business Compliance Policy-EPCRA Compliance Certification Form

If you are disclosing an EPCRA violation pursuant to the Small Business Compliance Policy, follow the steps in this section to complete the Compliance Certification form. The form also includes help text that provides additional information on how to complete the fields. Click on the “?” symbol to view the help text. There are three (3) different variations on the form depending on the section of EPCRA being disclosed. The following describes the information required for an EPCRA section 313 disclosure. Any difference will be highlighted within the descriptions.

Note: An auto-complete folder icon will display if you have entered information from previous forms. When you click on the  next to each field, a list of previously-entered data will display. You can select from the list by checking on the corresponding radio button and clicking on the “Select” button.

8.3.1. General Information

The General Information section of the Small Business Compliance Policy-EPCRA Compliance Certification form (Figure 8-26) captures general information related to the NAICS code and last environmental compliance certification.

- a. Primary NAICS code for this facility: If you are a multi-establishment facility, use the NAICS code of the establishment that provides the most revenue for the entire site. If you are unfamiliar with NAICS codes and their assignment to a facility or if you want to insure your facility is classified correctly please refer to <http://www.naics.com/search/>.

In order to start a search, click on the “Select” button. The “Name” and “NAICS Code” fields will display. You can search for a specific code by entering information in one or both fields. Click on the “Find” button to display matching search results. From the search results, select the corresponding radio button and hit the “Select” button. Your selection will populate in the “Primary NAICS code of this facility” field.

Note: Search results will be restricted to 100 matching NAICS Codes. If more than 100 matching results are found, you will need to provide more stringent search criteria or search via the NAICS website.

- b. Date of last environmental compliance: Click on the dropdowns to make a selection. The dropdowns include “None” and “Unknown” options for cases where you cannot provide specific information.
- c. Last environmental compliance inspection was performed by: Enter data in the text field.
- d. Regulatory area covered by inspection: Enter data in the text field.

Figure 8-26 General Information

EPCRA/313 Compliance Report for 5000 PLEASE SAVE ME Facility [EPCRA SBCP]

You cannot certify this submission until all fields are complete.

I. General Information

1. Primary NAICS code of this facility ?

Select

2. Date of last environmental compliance inspection by local, state or federal Agency:
 / /

3. Last environmental compliance inspection was performed by:

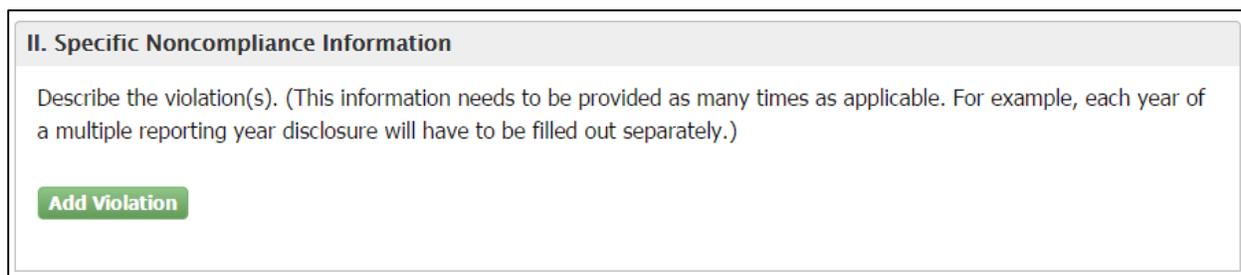
4. Regulatory area covered by inspection:

8.3.2.

Specific Non-Compliance Information:

The Specific Non-Compliance Information section of the Small Business Compliance Policy-EPCRA Compliance Certification form (Figure 8-27) allows the certifier to describe one or more violations. The information needs to be provided as many times as applicable. Click on the “Add Violation” button to enter information for each violation.

Figure 8-27 II. Specific Noncompliance Information



II. Specific Noncompliance Information

Describe the violation(s). (This information needs to be provided as many times as applicable. For example, each year of a multiple reporting year disclosure will have to be filled out separately.)

Add Violation

Once you click on the Add Violation, a grouping of seven questions will display as shown in Figure 8-28 Add Violation Fields. You will need to complete the fields as follows:

- a. Remove: The section includes a Remove button that allows you to remove the violation when needed. The information will be deleted from the form when clicking on this button.
- b. Number of full time employees at this site: Take the number of hours worked by all full-time, part-time, and contract employees, and anyone else who contributes to the functions of this facility. Enter the data in the text field.
- c. Physical location of the violation at the facility: Enter corresponding data in the text field.
- d. Violation Type: Select one of the following options from the dropdown:
 - Data Quality (Form A)
 - Data Quality (Form R)
 - Non-reporting (Form A)
 - Non-reporting (Form B)
 - Supplier Notification
 - Other
- e. Chemical Information: For each chemical that you are disclosing, specify the chemical name, its CAS (Chemical Abstract Society) number, and how much of that chemical was manufactured, processed or otherwise used (EPCRA §313) at the facility, in pounds, for the year in question. Refer to sections 8.3.2.1 and 8.3.2.2.

- f. Questions 6 and 7: To complete these fields you must click on the text boxes and enter data. You also have the option to add attachments as needed for each of these questions.

Note: An auto-complete folder icon will display if you have entered information for previous forms. When you click on the icon a list of previously entered data will display. You can select from the list by checking on the corresponding radio button and clicking on the "Select" button.

Figure 8-28 Add Violation Fields

Remove

1. Reporting Year
2. Number of full time employees at this site during reporting year: ?
3. Physical location of the violation at the facility: ?
4. Violation type? ?

5. Chemical Information, for each chemical you are disclosing for, specify the chemical name, its CAS (Chemical Abstract Society) number, and how much of that chemical was manufactured, processed or otherwise used (EPCRA §313) at the facility, in pounds, for the year in question. ?

Add Chemical

6. Provide the date and description of how the violation was corrected and how any harm was remediated. Attach documents supporting your actions. For example, include written confirmation from authorities that submittals (Tier II reports, Form R's) were received.

Add Attachment

7. Describe what steps were taken to prevent recurrence of the violation, and provide the date that those measures were implemented. If the measures have not yet been implemented, provide the implementation schedule setting forth the dates of the anticipated actions.

Add Attachment

8.3.2.1.

Add Chemical

In order to add a chemical to your violation, click on the “Add Chemical” button and a group of fields display. Note that the section includes a “Remove” button at the top for you to delete an added chemical when needed. If you select the Chemical radio button, you will see Section 1 as shown in Figure 8-29.

Figure 8-29 Add Chemical

Chemical Information Remove

Is this a chemical or mixture?

Chemical Mixture

SECTION 1. CHEMICAL

Use this button to search/find your chemical by CAS number.
?

Search

1.1 CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.)
7726-95-6

1.2 Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
BROMINE

1.3 Trade or Generic Chemical Name (Important: Complete only if Part I, Section 2.1 of the Form R is checked "Yes". Generic Name must be structurally descriptive.)

Click on the “Search” button to search for a chemical by CAS number. Additional fields display to help you search for the chemical name as shown in Figure 8-30. You can search for a chemical name by entering the name and/or the CAS Number. Click on the “Find” button when ready. A list of results displays. Click on the corresponding radio button and hit the “Select” button. Your selection will populate in fields 1.1 and 1.2 of “Section 1. Chemical”.

Figure 8-30 Section 1. Chemical

Use this button to search/find your chemical by CAS number.
?

Chemical Name and/or CAS Number Find Cancel

METHYLENE BROMIDE (74-95-3)

VINYL BROMIDE (593-60-2)

Select

Complete question “1.3 Trade or Generic Chemical Name” only if Part I, Section 2.1 of the Form R is checked "Yes".

Under Section 3. Activities and Uses of the Toxic Chemical, indicate if the manufacture of the toxic chemical is a produce or import by clicking on the corresponding checkbox. Also select a checkbox in the rest of the questions in Section 3.

Under Section 4. Maximum Amount of the Toxic Chemical, enter a numeric value in the “Amount” field.

8.3.2.2.

Add Mixture

In order to add a chemical to your violation, click on the “Add Chemical” button and a group of fields display. Note that the section includes a “Remove” button at the top for you to delete an added chemical when needed. If you select the Mixture radio button, you will see Section 2. Mixture Component Identity, where you will need to provide the chemical name provided by the supplier as shown in Figure 8-31.

Under Section 3. Activities and Uses of the Toxic Chemical: Indicate if the manufacture of the toxic chemical is to produce or import by clicking on the corresponding checkbox. Also select a checkbox in the rest of the questions in Section 3.

Under Section 4. Maximum Amount of the Toxic Chemical: enter a numeric value in the “Amount” field.

Figure 8-31 Mixture Sections

Chemical Information Remove

Is this a chemical or mixture?

Chemical Mixture

SECTION 2. MIXTURE COMPONENT IDENTITY

Trade or Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.)

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

Manufacture the toxic chemical: Produce Import

Process the toxic chemical:

- As a reactant
- As a formulation component
- As an article component
- Repackaging
- As an impurity

Otherwise use the toxic chemical:

- As a chemical processing aid
- As a manufacturing aid
- Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

Amount

8.3.3. Small Business Compliance Policy Conditions:

This section is for the user to indicate if all Small Business Compliance Policy conditions have been met (Figure 8-32). This section lists a total of four conditions. Please read the instructions for each question carefully and complete all conditions before submitting.

Figure 8-32 Small Business Compliance Policy Conditions

III. Small Business Compliance Policy Conditions

Criteria 1: Discovery is Voluntary * ?

The violation was voluntarily discovered (1st 4 boxes must be checked to qualify). *

- The violation was discovered prior to notice of an EPA or State inspection.
- The violation was not found through a legally required monitoring procedure that is required by statute, regulation, permit, judicial or administrative order, or consent agreement.
- The violation was not found through a legally required sampling procedure that is required by statute, regulation, permit, judicial or administrative order, or consent agreement.
- The violation was not found through a legally required auditing procedure that is required by statute, regulation, permit, judicial or administrative order, or consent agreement.
- This facility does not meet Criteria 1.

8.3.4.

Saving and Submitting

Save for Later button: This button is located at the bottom of the Compliance Certification form (Figure 8-33). The “Save for Later” button allows you to save the form if you are not able to complete it in one session. You can access the form from the “Go To Compliance Certification Page” hyperlink in Section 3 of the Violation Disclosure form. You can save it as many times as needed before you are ready for submittal.

Figure 8-33 Save and Submit buttons



Review & Submit button: This button is located at the bottom of the Compliance Certification Page next to the “Save for Later” button. Click on the “Review & Submit” button when you are ready to certify compliance. Remember that all required fields must be populated before submitting. A warning message as shown in Figure 8-34 will display on top of the form if you try to submit without completing the form correctly.

Figure 8-34 Compliance Certification Warning Message

You cannot certify this submission until all fields are complete.

Please address the following error(s).

- **Primary NAICS code must be provided.**
- **Date of last environmental compliance inspection is required.**
- **Last environmental compliance inspection was performed by is required.**
- **Regulatory area covered by inspection is required.**

Once you fill out all fields and click on the “Review and Submit” button, you will be routed to a read-only version of the form (Figure 8-35). This allows you to review before submitting.

Figure 8-35 Read Only Compliance Certification Form

You are here: [MyCDX](#)» Review: EPCRA/313 Compliance Report for APPLIED SCIENCE AND TECHNOLOGY (SPRINGFIELD, VA 22153) Facility [EPCRA SBCP]

EPCRA/313 Compliance Report for APPLIED SCIENCE AND TECHNOLOGY (SPRINGFIELD, VA 22153) Facility [EPCRA SBCP]

I. General Information

1. Primary NAICS code of this facility
[Brewers' and distillers' flakes and grits, corn, manufacturing](#)

2. Date of last environmental compliance inspection by local, state or federal Agency:
Year: 2014; Month: January; Day: 2

3. Last environmental compliance inspection was performed by: [John Jones](#)

4. Regulatory area covered by inspection: [Area 1](#)

The bottom of the page has a Certification section (Figure 8-36). It has an “Edit” button that allows you to go back and make changes as needed before submitting.

Read the section carefully, and when you are ready to certify compliance click on the checkbox. The “Certify” button becomes active for you to click on it.

Figure 8-36 Certification Section

IV. Certification

Name of individual submitting this self-disclosure:
Ms. Paulette Elvir

Current date:
9/11/2015

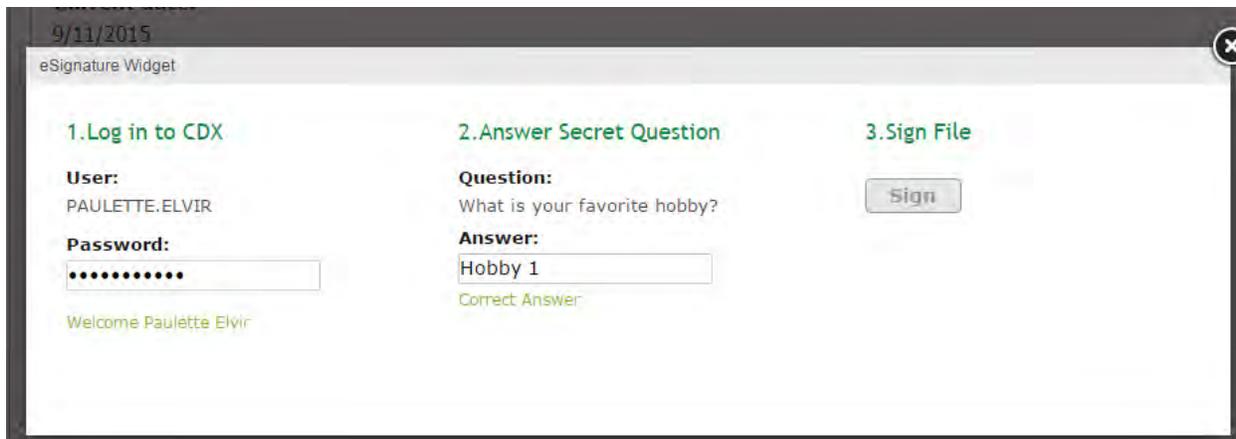
By checking this box, I, the person whose name is displayed above, am authorized to make this certification and certify under penalty of the law that this document was prepared under my direction and to the best of my knowledge and belief, the information submitted is true, accurate and complete. Furthermore, I understand that eligibility for, and any reduction of penalties under, the EPA Audit Policy is conditioned on the truth, accuracy and completeness of this disclosure.

[< Edit](#) [Certify](#)

An electronic signature widget displays on the screen (Figure 8-37). Enter the credentials you set up when registering with CDX. If you forgot your password you will be able to reset by clicking on the “Forgot Password” hyperlink included in the certification section.

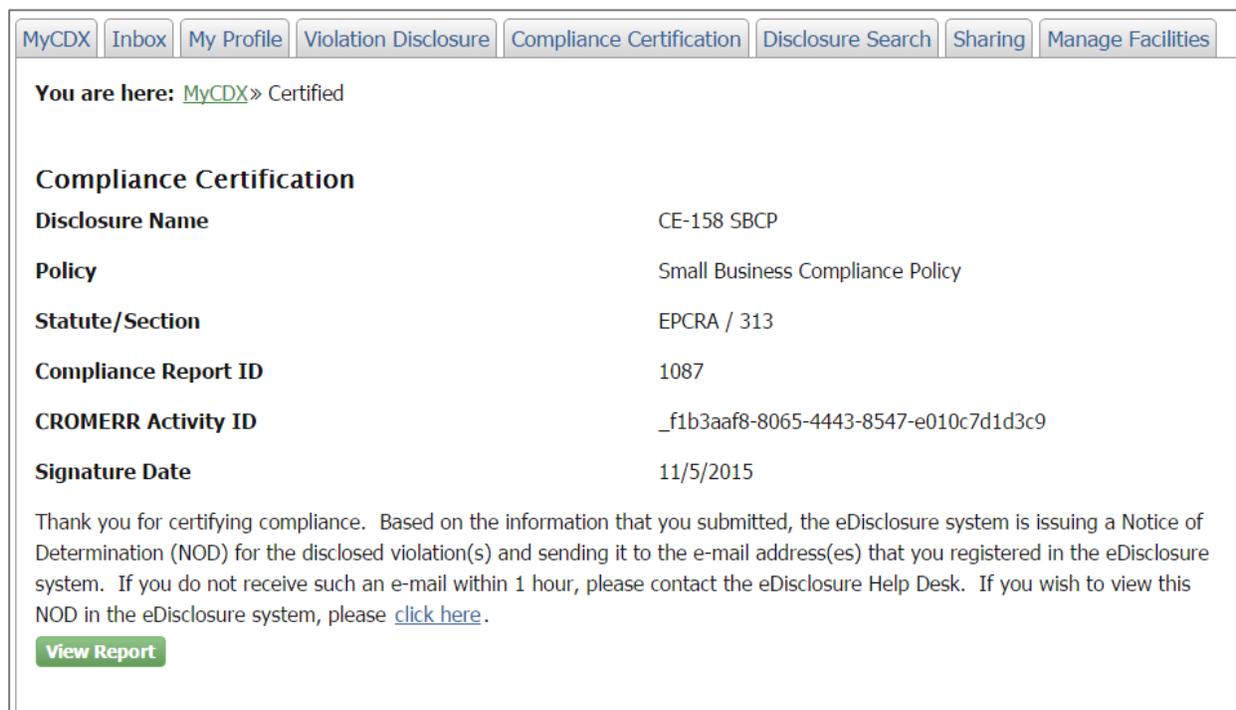
Enter your credentials and click on the “Sign” button.

Figure 8-37 eSignature Widget



Once you sign, a certification confirmation screen displays (Figure 8-38) indicating the compliance form has been certified. It includes general information on the form and the system’s determination. It also provides a “View Report” button to access a read-only version of the submitted compliance certification form.

Figure 8-38 Certification Confirmation



8.4. Small Business Compliance Policy Non-EPCRA Compliance Certification Form

If you are disclosing a non-EPCRA violation pursuant to the Small Business Compliance Policy, follow the steps in this section to complete the Compliance Certification form. Please note that you cannot certify the submission until all fields are complete. The form also includes help text that provides additional information on how to complete the fields. Click on the “?” symbol to view the help text.

8.4.1. General Information

The General Information section of the Small Business Compliance Policy Non-EPCRA Compliance Certification Form (Figure 8-39) captures general information related to the NAICS code and last environmental compliance certification.

- a. Primary NAICS code for this facility: If you are a multi-establishment facility, use the NAICS code of the establishment that provides the most revenue for the entire site. If you are unfamiliar with NAICS codes and their assignment to a facility, or if you want to insure your facility is classified correctly please refer to <http://www.naics.com/search/>.

In order to start a search, click on the “Select” button. The “Name” and “NAICS Code” fields will display. You can search for a specific code by entering information in one or both fields. Click on the “Find” button to display matching search results. From the search results, select the corresponding radio button and hit the “Select” button. Your selection will populate in the “Primary NAICS code of this facility” field.

Note: Search results will be restricted to 100 matching NAICS Codes. If more than 100 matching results are found, you will need to provide more stringent search criteria or search via the NAICS website.

- b. Date of last environmental compliance: Click on the dropdowns to make a selection. The dropdowns include “None” and “Unknown” options for cases where you cannot provide specific information.
- c. Last environmental compliance inspection was performed by: Enter data in the text field.
- d. Regulatory area covered by inspection: Enter data in the text field.

Figure 8-39 General Information

CERCLA/122L Compliance Report [SBCP]

You cannot certify this submission until all fields are complete.

I. General Information

1. Primary NAICS code of this facility ?

Select

2. Date of last environmental compliance inspection by local, state or federal Agency:
 / /

3. Last environmental compliance inspection was performed by:

4. Regulatory area covered by inspection:

8.4.2.

Specific Non-Compliance Information

The Specific Noncompliance Information section of the Small Business Compliance Policy Non-EPCRA Compliance Certification form allows the certifier to describe the violation(s). You will need to complete the fields as follows:

- a. Fields 1-4: These are all text fields. Click on the field to enter data. Fields 2 and 4 include helpt text that explain that you may include violations in statutory programs that were not part of your submitted disclosure, provided the information submitted on this Compliance Certification form also applies to any such newly added legal provisions.
- b. Dates in questions 6 and 7: A calendar widget displays when you click on the field. The calendar can go back months and years. You can either select a date from the calendar or enter a date following the mm/dd/yyyy format.
- c. Chemical Information: You can provide information for each chemical/pollutant being disclosed. For more information see Section 8.4.2.1.
- d. Questions 9 and 10: To complete these fields you must click on the text boxes and enter data. You also have the option to add attachments as needed for each of these questions (Figure 8-40).

Note: An auto-complete folder icon will display if you have entered information for previous repo forms. When you click on the icon a list of previously entered data will display. You can select from the list by checking on the corresponding radio button and clicking on the "Select" button.

Figure 8-40 II. Specific Non-Compliance Information

II. Specific Noncompliance Information

Describe the violation(s). Click on the  next to each field to auto-complete with data entered in previous compliance certifications.

1. **Nature and description of potential violation(s):** 

2. **Citation for the potential federal violation:**  
[e.g., 40 CFR Part 112.3]

3. **Regulatory citation for the state provisions where federally enforceable:** 

4. **Permit provisions where applicable:**  

5. **Physical location of the violation at the facility:**  

6. **Date noncompliance began:** 

7. **Date of return to compliance:** 

8. **Identity of Chemical/Pollutant Information.** For each chemical/ pollutant you are disclosing for, specify the a.) chemical/pollutant name or trade name, CAS (Chemical Abstract Society) number, and b.) how much of that chemical/pollutant was involved, in pounds.

9. **Provide the date and description of how the violation was corrected and how any harm was remediated.** If correction of the violation depends upon issuance of a permit that has been applied for but not issued by Federal, State, Local or Tribal authorities an entity may submit its compliance report without an issued permit (provided the maximum extension requests have been exhausted). Please describe the steps taken by the entity to ensure it submitted a timely complete permit application.

Attach documents supporting your actions. For example, include written confirmation from authorities that submittals (e.g., Notice of Intent (NOI), reports, etc.) were received.

10. **Describe what steps were taken to prevent recurrence of the violation and provide the date that those measures were implemented.** If the measures have not yet been implemented, provide the implementation schedule setting forth the dates of the anticipated actions.

Document Name

8.4.2.1.

Add Chemical

In order to add a chemical to your violation, click on the “Add Chemical” button and a group of fields display as shown in Figure 8-41 . You can add multiple chemicals by clicking the “Add Chemical” button multiple times. Note that the section includes a “Remove” button at the top for you to delete an added chemical when needed.

Figure 8-41 Add Chemical

Chemical Information **Remove**

Use this button to search/find your chemical by CAS number.
 ?

Search

a.1) Provide the chemical name (or common name of the chemical) as provided on the MSDS:

a.2) CAS Number

b) Amount involved lbs.

Click on the “Select” button to search for a chemical by CAS number. Additional fields display to help you search for the chemical name as shown in Figure 8-42.

Figure 8-42 Chemical Name Look-up tool

Chemical Information **Remove**

Use this button to search/find your chemical by CAS number.
 ?

Chemical Name and/or CAS Number **Find** **Cancel**

Acetyl bromide (506-96-7)

Bromide (24959-67-9)

Select

You can search for a chemical name by entering the name and/or the CAS Number. Click on the “Find” button when ready. A list of results displays. Click on the corresponding radio button and hit the “Select” button. Your selection displays in fields “a.1)” and “a.2)”. Complete question “b) Amount involved” by entering a numeric value in the field.

8.4.3.

Audit Policy Conditions

This section is for the user to indicate if all Audit Policy conditions have been met. This section lists a total of nine conditions as shown in Figure 8-43. Please read the instructions for each question carefully and complete all conditions before submitting.

Figure 8-43 III. Audit Policy Conditions

III. Small Business Compliance Policy Conditions

Criteria 1: Discovery is Voluntary * [?](#)

The violation was voluntarily discovered (1st 4 boxes must be checked to qualify). *

- The violation was discovered prior to notice of an EPA or State inspection.
- The violation was not found through a legally required monitoring procedure that is required by statute, regulation, permit, judicial or administrative order, or consent agreement.
- The violation was not found through a legally required sampling procedure that is required by statute, regulation, permit, judicial or administrative order, or consent agreement.
- The violation was not found through a legally required auditing procedure that is required by statute, regulation, permit, judicial or administrative order, or consent agreement.
- This facility does not meet Criteria 1.

8.4.4.

Saving and Submitting

Save for Later button: This button is located at the bottom of the Compliance Certification form as shown in Figure 8-44. The “Save for Later” button allows you to save the form if you are not able to complete it in one session. You can access the form from the “Go To Compliance Certification Page” hyperlink in Section 3 of the Violation Disclosure form. You can save it as many times as needed before you are ready for submittal.

Figure 8-44 Save and Submit buttons



Review & Submit button: This button is located at the bottom of the Compliance Certification Page next to the “Save for Later” button. Click on the “Review & Submit” button when you are ready to certify compliance. Remember that all required fields must be populated before submitting. A warning message will display on top of the form if you try to submit it without completing the form correctly as shown in Figure 8-45.

Figure 8-45 Compliance Certification Warning Message

You cannot certify this submission until all fields are complete.

Please address the following error(s).

- Primary NAICS code must be provided.
- Date of last environmental compliance inspection is required.
- Last environmental compliance inspection was performed by is required.
- Regulatory area covered by inspection is required.

Once you fill out all fields and click on the “Review and Submit” button, you will be routed to a read-only version of the form (Figure 8-46). This allows you to review it before submitting.

Figure 8-46 Read Only Compliance Certification Form

CERCLA/122A Compliance Report [SBCP]	
I. General Information	
1. Primary NAICS code of this facility	Densified wood manufacturing
2. Date of last environmental compliance inspection by local, state or federal Agency:	Year: 2012; Month: March; Day: Unknown
3. Last environmental compliance inspection was performed by:	test
4. Regulatory area covered by inspection:	test

The bottom of the page has a Certification section (Figure 8-47). It has an “Edit” button that allows you to go back and make changes as needed before submitting.

Read the section carefully, and when you are ready to certify compliance click on the checkbox. The “Certify” button becomes active for you to click on it.

Figure 8-47 Certification Section

IV. Certification
Name of individual submitting this self-disclosure: Ms. Paulette Elvir
Current date: 9/11/2015
<input type="checkbox"/> By checking this box, I, the person whose name is displayed above, am authorized to make this certification and certify under penalty of the law that this document was prepared under my direction and to the best of my knowledge and belief, the information submitted is true, accurate and complete. Furthermore, I understand that eligibility for, and any reduction of penalties under, the EPA Audit Policy is conditioned on the truth, accuracy and completeness of this disclosure.
<input type="button" value=" < Edit"/> <input type="button" value=" Certify"/>

An electronic signature widget displays on the screen as shown in Figure 8-48. Enter the credentials you set up when registering with CDX. If you forgot your password you will be able to reset by clicking on the “Forgot Password” hyperlink included in the certification section.

Enter your credentials and click on the “Sign” button.

Figure 8-48 eSignature Widget

9/11/2015

eSignature Widget

1. Log in to CDX

User:
PAULETTE.ELVIR

Password:
••••••••

Welcome Paulette Elvir

2. Answer Secret Question

Question:
What is your favorite hobby?

Answer:
Hobby 1

Correct Answer

3. Sign File

Sign

Once you sign, a certification confirmation screen displays indicating the compliance certification form has been submitted as shown in Figure 8-49. It includes general information on the form and the system's determination. It also provides a "View Report" button to access a read-only version of the submitted compliance certification form.

Figure 8-49 Certification Confirmation

MyCDX | Inbox | My Profile | Violation Disclosure | Compliance Certification | Disclosure Search | Sharing | Manage Facilities

You are here: [MyCDX](#)» Certified

Compliance Certification

Disclosure Name	CE-158 SBCP
Policy	Small Business Compliance Policy
Statute/Section	CERCLA / 122L
Compliance Report ID	1083
CROMERR Activity ID	_2bf637e1-9d6e-44b7-ac77-0829c570b35f
Signature Date	11/5/2015

Thank you for certifying compliance. Based on the information that you submitted, the eDisclosure system is issuing an Acknowledgement Letter for the disclosed violation(s) and sending it to the e-mail address(es) that you registered in the eDisclosure system. If you do not receive such an e-mail within 1 hours, please contact the eDisclosure Help Desk. If you wish to view this Acknowledgement Letter in the eDisclosure system, please [click here](#).

[View Report](#)

8.5. Compliance Certification Tab

The Compliance Certification page displays two tables. The first table includes disclosures that have Compliance Certification forms that are complete and ready for certification. The second table includes disclosures with Compliance Certification forms that are not yet complete (Figure 8-50).

Figure 8-50 Compliance Certification Tab

MyCDX
Inbox
My Profile
Violation Disclosure
Compliance Certification
Disclosure Search
Sharing
Manage Facilities

You are here: [MyCDX](#) » Compliance Reports

The following disclosures have Compliance Certification forms that are complete and ready for certification. You can review certifications individually by clicking on the Go To Compliance Certification hyperlink. Alternatively, check the boxes for those that you wish to certify as a batch and click on the Review & Certify button (note, on the next screen you will be given an opportunity to review all of them prior to certification).

Compliance Certification Forms Ready for Review and Submittal

[Expand all](#) [Collapse all](#)

Select All	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
<input type="checkbox"/>	▶ Audit Policy Disclosure			In Progress - Disclosure(s) & Compliance Certification(s) Pending	<ul style="list-style-type: none"> • Details

Review & Certify
?

The Compliance Certification forms for the following disclosures are not complete. They must be completed before they are ready for certification. This must be done individually, by clicking on the Go To Compliance Certification hyperlink for the specific disclosure desired.

Compliance Certification Forms that Need to be Finished

[Expand all](#) [Collapse all](#)

Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
▶ Extension Page			In Progress - Compliance Certification(s) Pending	<ul style="list-style-type: none"> • Details
▶ Test CE-158			In Progress - Compliance Certification(s) Pending	<ul style="list-style-type: none"> • Details
▶ CE-127 Test			In Progress - Compliance Certification(s) Pending	<ul style="list-style-type: none"> • Details
▶ Test PD 01			In Progress - Compliance Certification(s) Pending	<ul style="list-style-type: none"> • Details
▶ CE-121 SBCEP			In Progress - Compliance Certification(s) Pending	<ul style="list-style-type: none"> • Details
▶ Audit Policy Disclosure			In Progress - Disclosure(s) & Compliance Certification(s) Pending	<ul style="list-style-type: none"> • Details

8.5.1. Compliance Certification Forms Ready for Review and Submittal

Click on the “Expand All” hyperlink to get a detailed view of the disclosures included in the table. You can also expand a specific disclosure by clicking on the arrow key on the left side of the disclosure name. Note that the Available Actions column includes two different hyperlinks at the section level: “Go To Compliance Certification Page” and “Review and Certify Compliance” as shown in Figure 8-51.

Figure 8-51 Compliance Certification Forms Ready for Review and Submittal

Select All	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
<input type="checkbox"/>	CE-121 SBCP			In Progress - Compliance Certification(s) Pending	<ul style="list-style-type: none"> Details
<input type="checkbox"/>	Disclosure Group 1				
<input type="checkbox"/>	BALTIMORE COUNTY RECREATION & PARKS (BALTIMORE, MD 212360000)				
<input type="checkbox"/>	Clean Air Act (CAA)				
<input type="checkbox"/>	110 Implementation Plan for National Primary and Secondary Ambient Air Quality Standards (Tribal Implementation Plan for National Primary and Secondary Ambient Air Quality Standards)	10/01/15	10/05/15	Compliance Certification Due 01/03/16 [59 Days]	<ul style="list-style-type: none"> Go To Compliance Certification Page Review & Certify Compliance
<input type="checkbox"/>	Audit Policy Disclosure			In Progress - Disclosure(s) & Compliance Certification(s) Pending	<ul style="list-style-type: none"> Details
<input type="checkbox"/>	Disclosure Group 1				
<input type="checkbox"/>	BALTIMORE COUNTY RECREATION & PARKS (BALTIMORE, MD 212360000)				
<input type="checkbox"/>	Emergency Planning and Community Right-to-Know Act (EPCRA)				
<input type="checkbox"/>	311 Material Safety Data Sheets (MSDS) (Material Safety Data Sheets (MSDS))	10/01/15	10/05/15	Compliance Certification Due 12/04/15 [29 Days]	<ul style="list-style-type: none"> Go To Compliance Certification Page Review & Certify Compliance

Review & Certify ?

The “Go To Compliance Certification Page” hyperlink takes you the editable version of the form and allows you to make additional changes. The “Review and Certify Compliance” link routes to a read-only version of the form that is ready for certification (Figure 8-52). Both links review certifications individually.

Figure 8-52 Review and Certify Compliance

CAA/110 Compliance Report [SBCP]

I. General Information

1. Primary NAICS code of this facility
 Chrome pigments (e.g., chrome green, chrome orange, chrome yellow) manufacturing

2. Date of last environmental compliance inspection by local, state or federal Agency:
 Year: 2013; Month: March; Day: 11

3. Last environmental compliance inspection was performed by: tester abc

4. Regulatory area covered by inspection: area 123

If you wish to certify multiple forms as a single batch, check the boxes under the “Select All” column for those you wish to certify and click on the “Review and Certify” button as displayed in Figure 8-53.

Figure 8-53 Certifying Multiple Compliance Certification Forms

Compliance Certification Forms Ready for Review and Submittal

[Expand all](#) [Collapse all](#)

Select All	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
<input type="checkbox"/>	▼ CE-121 SBCP			In Progress - Compliance Certification(s) Pending	• Details
<input type="checkbox"/>	▼ Disclosure Group 1				
<input type="checkbox"/>	▼ BALTIMORE COUNTY RECREATION & PARKS (BALTIMORE, MD 212360000)				
<input type="checkbox"/>	▼ Clean Air Act (CAA)				
<input checked="" type="checkbox"/>	110 Implementation Plan for National Primary and Secondary Ambient Air Quality Standards (Tribal Implementation Plan for National Primary and Secondary Ambient Air Quality Standards)	10/01/15	10/05/15	Compliance Certification Due 01/03/16 [59 Days]	• Go To Compliance Certification Page • Review & Certify Compliance
<input type="checkbox"/>	▼ Audit Policy Disclosure			In Progress - Disclosure(s) & Compliance Certification(s) Pending	• Details
<input type="checkbox"/>	▼ Disclosure Group 1				
<input type="checkbox"/>	▼ BALTIMORE COUNTY RECREATION & PARKS (BALTIMORE, MD 212360000)				
<input type="checkbox"/>	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				
<input checked="" type="checkbox"/>	311 Material Safety Data Sheets (MSDS) (Material Safety Data Sheets (MSDS))	10/01/15	10/05/15	Compliance Certification Due 12/04/15 [29 Days]	• Go To Compliance Certification Page • Review & Certify Compliance

Review & Certify ?

The following screen allows you to review the selected form prior to certification. You can use the scroll bar to review the forms or you can also click on the links on the top of the screen to scroll to a specific form (Figure 8-54). Note that there is a pencil icon next to each Compliance Certification link. Clicking on the icon will take you to the editable version of the form in case you wish to make additional changes before certifying.

Figure 8-54 Review Screen for Batch Certification

MyCDX | Inbox | My Profile | Violation Disclosure | **Compliance Certification** | Disclosure Search | Sharing | Manage Facilities

You are here: [MyCDX](#) >> Compliance Report Certification

Compliance Report Certification

The following compliance reports will be certified.

- >> [EPCRA/311 Compliance Report for BALTIMORE COUNTY RECREATION & PARKS \(BALTIMORE, MD 212360000\) Facility \[EPCRA Audit Policy\]](#)
- [CAA/110 Compliance Report \[SBCP\]](#)

EPCRA/311 Compliance Report for BALTIMORE COUNTY RECREATION & PARKS (BALTIMORE, MD 212360000) Facility [EPCRA Audit Policy]

I. General Information

1. Primary NAICS code of this facility
Boxes, wood, plain or fabric covered, nailed or lock corner, manufacturing

2. Date of last environmental compliance inspection by local, state or federal Agency:
Year: 2015; Month: April; Day: 11

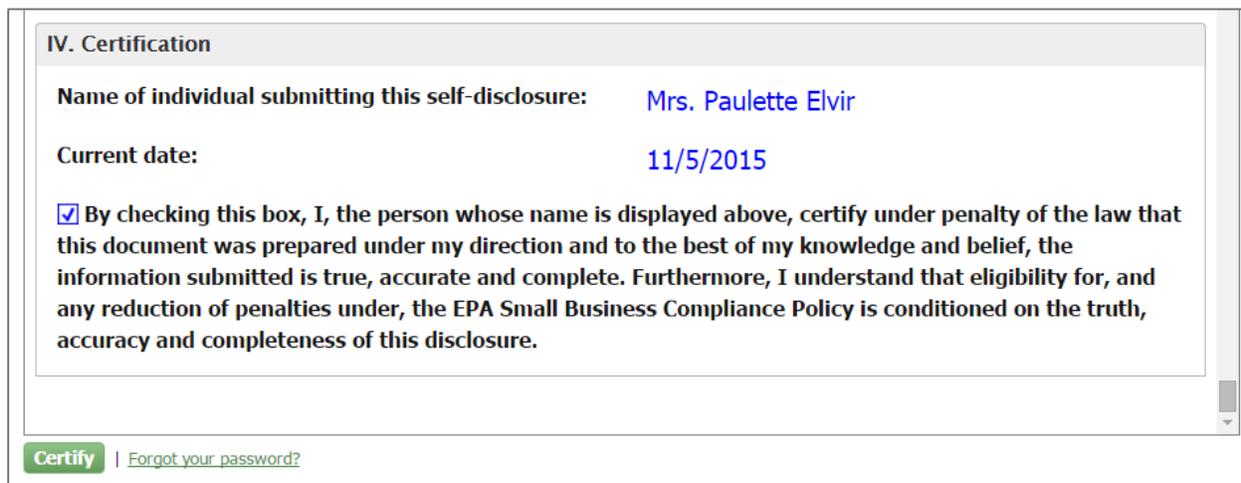
3. Last environmental compliance inspection was performed by: tester abc

4. Regulatory area covered by inspection: area 123

II. Specific Noncompliance Information

Click on the “Certify” button at the bottom of the screen when you are ready to certify all selected forms.

Figure 8-55 Section IV. Certification



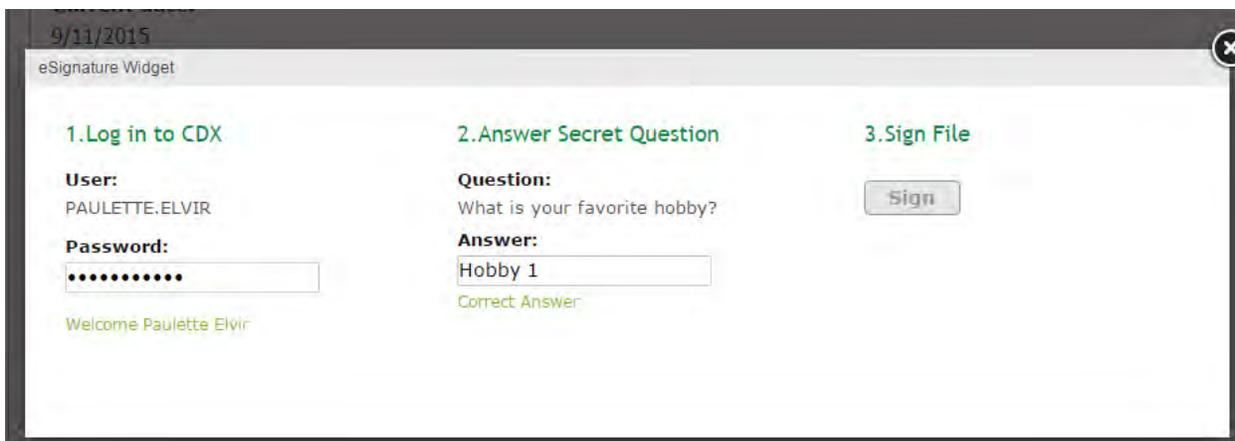
The screenshot shows a web form titled "IV. Certification". It contains the following fields and text:

- Name of individual submitting this self-disclosure:** Mrs. Paulette Elvir
- Current date:** 11/5/2015
- A checkbox is checked, followed by the text: "By checking this box, I, the person whose name is displayed above, certify under penalty of the law that this document was prepared under my direction and to the best of my knowledge and belief, the information submitted is true, accurate and complete. Furthermore, I understand that eligibility for, and any reduction of penalties under, the EPA Small Business Compliance Policy is conditioned on the truth, accuracy and completeness of this disclosure."
- At the bottom left, there is a green "Certify" button and a link for "Forgot your password?".

An electronic signature widget displays on the screen as shown in Figure 8-56. Enter the credentials you set up when registering with CDX. If you forgot your password you will be able to reset by clicking on the “Forgot Password” hyperlink included in the certification section.

Enter your credentials and click on the “Sign” button.

Figure 8-56 eSignature Widget



The screenshot shows the "eSignature Widget" window. It has a title bar with the date "9/11/2015" and a close button. The main content area is divided into three sections:

- 1. Log in to CDX:** Includes fields for "User:" (PAULETTE.ELVIR) and "Password:" (masked with dots). Below these is a "Welcome Paulette Elvir" message.
- 2. Answer Secret Question:** Includes a "Question:" field with the text "What is your favorite hobby?" and an "Answer:" field with the text "Hobby 1". Below the answer field is a "Correct Answer" message.
- 3. Sign File:** Contains a "Sign" button.

Once you sign, a certification confirmation screen displays indicating that the compliance certification form has been submitted as shown in Figure 8-57. It includes information on the system’s determination for each of the forms included in the batch certification. It also provides

hyperlink to access a read-only version of the submitted compliance certification forms. You will receive a confirmation email with the system determination for all certified forms.

Figure 8-57 Certification Confirmation



8.5.2. Compliance Certification Forms that Need to be Finished

The second table in the Compliance Certification tab provides another alternative way to access compliance certification forms other than the Violation Disclosure landing page. Click on the “Expand All” hyperlink at the top of the table to get a detailed view of the disclosures in the table. You can also expand a specific disclosure by clicking on the arrow key on the left side of the disclosure name.

Click on the “Go To Compliance Certification Page” hyperlink to open a compliance certification form as shows in Figure 8-58.

Figure 8-58 Compliance Certification Forms that Need to be Finished

Compliance Certification Forms that Need to be Finished				
Expand all Collapse all				
Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
▼ Extension Page			In Progress - Compliance Certification(s) Pending	• Details
▼ Disclosure Group 1				
▼ RESERS FINE FOODS (BEAVERTON, OR 97005)				
▼ Clean Air Act (CAA)				
110 Implementation Plan for National Primary and Secondary Ambient Air Quality Standards (Tribal Implementation Plan for National Primary and Secondary Ambient Air Quality Standards)	10/26/15	10/29/15	Compliance Certification Due 12/28/15 [53 Days]	• Go To Compliance Certification Page
▼ Disclosure Group 3				
▼ RESERS FINE FOODS (BEAVERTON, OR 97005)				
▼ Resource Conservation and Recovery Act (RCRA)				
3002 Standards Applicable to Generators of Hazardous Waste (Gen Hazardous Waste Management - Subtitle C - SQG)	10/08/15	10/29/15	Compliance Certification Due 12/28/15 [53 Days]	• Go To Compliance Certification Page

The “Go to Compliance Certification Page” link will open up the compliance certification form as displayed below in Figure 8-59. To complete the form, follow the steps specified in section 8.1 through 8.4

Figure 8-59 Compliance Certification Form

MyCDX	Inbox	My Profile	Violation Disclosure	Compliance Certification	Disclosure Search	Sharing	Manage Facilities
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You are here: [MyCDX](#)» New: CAA/110 Compliance Report [Audit Policy]

CAA/110 Compliance Report [Audit Policy]

You cannot certify this submission until all fields are complete.

I. General Information

Click on the  next to each field to auto-complete with data entered in previous compliance certifications.

1. Primary NAICS code of this facility ? 

Search

2. Date of last environmental compliance inspection by local, state or federal Agency:
 / /

3. Last environmental compliance inspection was performed by: 

4. Regulatory area covered by inspection: 

II. Specific Noncompliance Information

Describe the violation(s). Click on the  next to each field to auto-complete with data entered in previous compliance certifications.

9. System Determinations

When Compliance Certifications are submitted, the system will make a determination that will be displayed in the Certification Confirmation screen once you sign the compliance certification form. Violation disclosures that are not submitted in a timely manner will also trigger a systematic response sent to the user. The system will send out an email with additional information indicating the issuance of one of the following letters:

- Ineligibility Due to Untimely Disclosure
- Not Eligible for Category 1 or Category 2
- Ineligibility Due to Timeout of a Compliance Certification Form
- Electronic Notice of Determination (eNOD)
- Acknowledgement Letter

9.1. Ineligibility Due to Untimely Violation Disclosure

If the user fails to disclose a violation within the required 21 days of discovery, the system updates the status to “Ineligibility Letter Issued (MM/DD/YY)” immediately after the user clicks on the “Submit Selected Disclosures” button. The Available Actions column will include a hyperlink to the ineligibility letter. The system will also generate an email notification to the user.

This determination will include the following text:

PLEASE NOTE: The date of this disclosure is more than 21 days after discovery of the potential violation(s). Therefore, this disclosure is not eligible to receive an electronic Notice of Determination (eNOD) or Acknowledgement Letter (AL). EPA will retain a record of the disclosure and any potential further interaction with EPA concerning this matter will occur outside the eDisclosure system. In the event of an enforcement action, EPA will take into account all relevant facts and circumstances surrounding any violations, including the voluntary nature of your disclosure submitted through this system.

9.2. Not Eligible for Category 1 or Category 2

There are cases where the user submits a fully completed timely disclosure and compliance certification, but does not meet the required conditions to qualify for Category 1 or Category 2. The system generates a response immediately after the user signs and submits the Compliance Certification. The system updates the status to “Ineligibility Letter Issued (MM/DD/YY)”. The Available Actions column will include a hyperlink to the ineligibility letter as shown in Figure 9-1. The system will also generate an email notification to the user that will include the following text:

PLEASE NOTE: Based on the information that you submitted, this disclosure is not eligible to receive an electronic Notice of Determination (eNOD) or Acknowledgement Letter (AL). EPA will retain a record of the disclosure and any potential further interaction with EPA concerning this matter will occur outside the eDisclosure system. In the event of an enforcement action, EPA will take into account all relevant facts and

circumstances surrounding any violations, including the voluntary nature of your disclosure submitted through this system.

Figure 9-1 Ineligibility Letter

Select All <input type="checkbox"/>	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
	▼ Disclosure Group 1				
	▼ APPLIED SCIENCE AND TECHNOLOGY (SPRINGFIELD, VA 22153)				
	▼ Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)				
	103A Notification of Hazardous Reportable Quantity Release (Reporting and Access)	10/20/15	10/27/15	Acknowledgement Letter Issued 10/27/15	<ul style="list-style-type: none"> Go To Compliance Certification Page View Acknowledgement Letter
	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				
	311 Material Safety Data Sheets (MSDS) (Material Safety Data Sheets (MSDS))	10/20/15	10/27/15	Ineligibility Letter Issued on 10/27/15	View Ineligibility Letter ←

9.3. Ineligible Due to Timeout of a Compliance Certification Form

If the user fails to timely certify compliance, the system will deem the violation as not eligible for Category 1 or Category 2. The system updates the status to “Ineligibility Letter Issued [dd/mm/yyyy]” once the compliance certification deadline has passed. The Available Actions column will include a hyperlink to the ineligibility letter. The system generates a response by email that includes the following text:

PLEASE NOTE: EPA records indicate that the deadline for certifying compliance for the above-cited disclosure(s) has passed. Therefore, the above-cited disclosure(s) is/are not eligible to receive an electronic Notice of Determination (eNOD) or Acknowledgement Letter (AL). EPA will retain a record of such disclosure(s) and any potential further interaction with EPA concerning such matter(s) will occur outside the eDisclosure system. In the event of an enforcement action, EPA will take into account all relevant facts and circumstances surrounding any violations, including the voluntary nature of your disclosure(s) submitted through this system.

9.4. Electronic Notice of Determination (eNOD)

When the user certifies compliance in a timely manner and meets conditions that qualify the violation disclosure as Category 1, the system will generate an eNOD. Category 1 applies to EPCRA violations that meet all Audit Policy conditions and EPCRA violations that meet all Small Business Compliance Policy conditions. It does not include CERCLA 103/EPCRA 304 chemical release reporting violations and EPCRA violations with significant economic benefit (as defined by EPA).

Disclosers receiving an eNOD will see a confirmation message with the following text:

Thank you for certifying compliance. Based on the information that you submitted, the eDisclosure system is issuing a Notice of Determination (NOD) for the disclosed violation(s) and sending it to the e-mail address (es) that you registered in the eDisclosure system. If you do not receive such an e-mail within one hour, please contact the [eDisclosure Help Desk](#). If you wish to view this NOD in the eDisclosure system, please click [here](#).

The system also generates an official Notice of Determination letter, confirming that the violations are resolved with no assessment of civil penalties, conditioned on the accuracy and completeness of the submitter's eDisclosure. The Available Actions column will include a hyperlink to the Notice of Determination letter and the Status column will reflect an updated status of Notice of Determination Issued (MM/DD/YY) as shown in Figure 9-2.

Figure 9-2 Notice of Determination

Select All <input type="checkbox"/>	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
	▼ Disclosure Group 1				
	▼ VINTAGE 2 (CHESTER, VA 23836)				
	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				
	313 Toxic Chemical Release Reporting (TRI) (Toxics Chemical Release Inventory (TRI))	09/10/15	09/30/15	Notice of Determination Issued 09/30/15	<ul style="list-style-type: none"> Go To Compliance Certification Page View Notice of Determination Letter
	▼ Disclosure Group 2				
	▼ AMERICAN ENERGY RESTAURANT EQUIPMENT (SPRINGFIELD, VA 22153)				
	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				
	313 Toxic Chemical Release Reporting (TRI) (Toxics Chemical Release Inventory (TRI))	09/15/15	09/30/15	Notice of Determination Issued 10/01/15	<ul style="list-style-type: none"> Go To Compliance Certification Page View Notice of Determination Letter

9.5. Acknowledgement Letter

When the user certifies compliance in a timely manner and meets conditions that qualify the violation disclosure as Category 2, the system will generate an Acknowledgement Letter. Category 2 includes all Non-EPCRA violations; EPCRA violations where the discloser can only certify compliance with Audit Policy Conditions 2-9 (i.e., discovery was not systematic); and EPCRA/CERCLA violations excluded from Category 1.

Disclosers receiving an Acknowledgement Letter will see a confirmation message with the following text:

Thank you for certifying compliance. Based on the information that you submitted, the eDisclosure system is issuing an Acknowledgement Letter for the disclosed violation(s) and sending it to the e-mail address (es) that you registered in the eDisclosure system. If you do not receive such an e-mail within one hour, please contact the [eDisclosure Help Desk](#). If you wish to view this Acknowledgement Letter in the eDisclosure system, please click [here](#).

The system also generates an official Acknowledgment Letter, noting EPA's receipt of the disclosure and promising that EPA will make a determination as to eligibility for penalty

mitigation if and when it considers taking enforcement action for environmental violations. The Available Actions column will include a hyperlink to the Acknowledgement Letter and the Status column will reflect an updated status of Acknowledgement Letter Issued (MM/DD/YY) as shown in Figure 9-3.

Figure 9-3 Acknowledgement Letter

Select All <input type="checkbox"/>	Disclosure Group Name	Violation Discovery Date	Disclosure Submission Date	Status	Available Actions
	▼ Disclosure Group 1				
	▼ APPLIED SCIENCE AND TECHNOLOGY (SPRINGFIELD, VA 22153)				
	▼ Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)				
	103A Notification of Hazardous Reportable Quantity Release (Reporting and Access)	10/20/15	10/27/15	Acknowledgement Letter Issued 10/27/15	<ul style="list-style-type: none"> Go To Compliance Certification Page View Acknowledgement Letter
	▼ Emergency Planning and Community Right-to-Know Act (EPCRA)				
	311 Material Safety Data Sheets (MSDS) (Material Safety Data Sheets (MSDS))	10/20/15	10/27/15	Ineligibility Letter Issued on 10/27/15	<ul style="list-style-type: none"> View Ineligibility Letter



10. Sharing Violation Disclosures

The Sharing tab allows the user to share a violation disclosure with other individuals in cases where additional input is needed. It also provides the flexibility for a user to start a violation disclosure and share access when another person will be certifying.

The tab has an Open Disclosures table that displays all open violations for a specific user. The table follows the same format as the other tables in the system. It displays violations in bundles and includes arrows so you can expand to see more information on a particular disclosure. It also includes general information like the Disclosure Initiation Date and the current status as shown in Figure 10-1.

Figure 10-1 Sharing Tab

MyCDX
Inbox
My Profile
Violation Disclosure
Compliance Certification
Disclosure Search
Sharing
Manage Facilities

You are here: [MyCDX](#) » Sharing

The **Open Disclosures** and **Closed Disclosures** tables below show all the violation disclosures that are available for you to share with other users. This includes your disclosures and any disclosures that others have shared with you.

Click on the [List](#) hyperlink in the Share With column for any individual open or closed disclosures that you wish to share and enter one or more e-mail addresses. To share all Disclosures, click on the **Share All** button in the appropriate table(s) below.

You may revoke a shared user's access by clicking on the [List](#) hyperlink in the Share With column and removing a user or you may remove all shared access by clicking on the **Revoke All** button in the **Open Disclosures** or **Closed Disclosures** table(s).

Open Disclosures

[Expand all](#) [Collapse all](#)

Disclosure Name	Disclosure Initiation Date	Status	Available Actions	Share With	Shared
▶ Test No Facility	11/04/15	In Progress - Compliance Certification(s) Pending	Details	List	
▶ Extension Page	10/29/15	In Progress - Compliance Certification(s) Pending	Details	List	
▶ Test CE-158	10/27/15	In Progress - Compliance Certification(s) Pending	Details	List	🗑️
▶ CE-136	10/26/15	In Progress - Disclosure(s) & Compliance Certification(s) Pending	Details	List	
▶ CE-127 Test	10/26/15	In Progress - Compliance Certification(s) Pending	Details	List	
▶ CE-103	10/26/15	In Progress - Disclosure(s) & Compliance Certification(s) Pending	Details	List	🗑️
▶ Test ABC	10/14/15	In Progress - Disclosure(s) & Compliance Certification(s) Pending	Details	List	
▶ Test PD 01	10/14/15	In Progress - Compliance Certification(s) Pending	Details	List	
▶ CE-121 SBCP	10/05/15	In Progress - Compliance Certification(s) Pending	Details	List	
▶ Audit Policy Disclosure	10/05/15	In Progress - Disclosure(s) & Compliance Certification(s) Pending	Details	List	

Share All ?
Revoke All ?

The table below shows all of the closed disclosures.

Closed Disclosures

[Expand all](#) [Collapse all](#)

Disclosure Name	Disclosure Initiation Date	Status	Available Actions	Share With	Shared
No Disclosures Found					

The sharing will take place by providing the email addresses of the people with whom the user wants to share a violation disclosure. Click on the “List” hyperlink in the “Share With” column. A pop-up message displays where you can enter one or more email addresses (Figure 10-2). Enter an email address in the field and click on the “Add” button. Repeat if you wish to add more email addresses to the list. Once you are ready to share, click on the “Save Changes” button in the pop-up window, the system will provide an additional message asking you to confirm your selection. When you confirm, you will have shared the violation disclosure with the selected individuals. The system will send out an email to both the person sharing the violation disclosure and the person(s) receiving access. Once the new user(s) have access, they will have the same privileges as the original discloser.

Figure 10-2 List Pop-up

Manage Emails

Use the field below to add email addresses of the user(s) with whom you wish to share the disclosure(s). **Note:** A user must have a CDX account to view your disclosure. They will receive an email with instructions on how to access.

Email:

Below are the email addresses able to view and edit the disclosure(s). Revoke any by clicking the **x**.

Emails	
 paulette.elvir@cgifederal.com	<input type="text"/>

You will also have the option to share all of your open violations by clicking on the “Share All” button. The “Revoke All” button revokes access previously granted by the sharer. The system will also send out an email to both the person sharing/revoking the violation disclosure and the person(s) receiving/losing access.

The second table in the Sharing tab is titled “Closed Violations” and it lists disclosures that have reached a resolution. You have the option to share these disclosures by clicking on the “List” hyperlink in the “Share With” column. You will not be able to edit the record since the disclosure has been completed.