

Quick Reference Guide Creating a Primary Form U

Prerequisites

- 1. User is registered in CDX and has a role as either an Authorized Official or Agent/Consultant in the Chemical Data Reporting application.
- 2. See the User Roles and Access Quick Reference Guide for details.

Creating a Primary Form

*asterisks mark required fields

An icon next to a field provides additional information about the field. To activate the legend place the mouse cursor over the icon and a brief explanation will display. This tooltip does not provide navigation.

- 1. Log in to CDX at https://cdx.epa.gov/.
- 2. Click the **Primary Authorized Official** or **Primary Agent/Consultant** link.
- 3. Select **TSCA Chemical Data Reporting 2020** from the drop-down on the **Chemical Information Submission System** page.
- 4. Click the **OK** button.
- 5. Click the **Create New Form** button within the Actions column for the desired site on the **Manage Forms** page.
- 6. Create a **Passphrase** to secure access to your form. Enter the following information on the **Create Passphrase** page:
 - a. New Passphrase *
 - b. Confirm Passphrase *
 - i. The passphrase must be between 8 and 20 characters long and may not contain special characters (+, ?, *, etc.)
 - c. After creating a passphrase, add a **Passphrase Hint** to help you remember the passphrase for this form. If you forget the passphrase, after three (3) failed attempts the hint will display. Please do not include the passphrase as part of your hint *
- 7. Click the **Continue** button.

Accessing an Existing Primary Form

- 1. Log in to CDX at https://cdx.epa.gov/.
- 2. Click the **Primary Authorized Official** or **Primary Agent/Consultant** link.
- 3. Select **TSCA Chemical Data Reporting (CDR) 2020** from the drop-down on the **Chemical Information Submission System** page.
- 4. Click the **Edit** icon within the Actions column for the desired site on the **Manage Forms** page.
- 5. Enter the passphrase on the **Enter Passphrase** page.
- 6. Click the **Continue** button.
- 7. If you fail to provide the correct passphrase 3 times, the **Hint** entered in Creating a Primary Form step 6.c above will display.
- 8. If you are still unable to access the form, then click the **Reset Passphrase** link to generate and send an email with a temporary passphrase to the appropriate individuals (i.e., Authorized Official who created the passphrase and approved Authorized Official(s), Primary and Secondary Agent/Consultant) of the passphrase change request.



Step 1 Form Information

Step 1.1 Identify a Highest-level Parent Company

Step 1.1.1 User Registered in CDX with a U.S. Company Identify

1. Verify or update your highest-level U.S. parent company information

- a. The information you entered upon registering in CDX is used to pre-fill in the U.S. company identity. Verify that the information displayed on the **Parent Company Information** page correctly identifies the highest-level parent company for the site or update as needed and populate the following fields:
 - i. Company Name *
 - ii. Company Dun & Bradstreet Number *
 - iii. Company Address *
 - iv. Company Address 2
 - v. City *
 - vi. County/Parish *
 - vii. State/Province/Other *
 - viii. Zip Code *
 - ix. Country * (displays United States)
- b. Click the **Save** button.
- c. Click the **Cancel** button to close the parent company fields without saving the entered information.

2. Add your Highest-level Foreign Parent Company

- a. Click the **Add Foreign Parent Company** button to report a foreign organization as your highest-level foreign parent company for the site. Otherwise, to continue without a foreign parent company, proceed to step 10.
- b. Populate the following fields to identify the foreign parent company.
 - i. Company Name *
 - ii. Company Dun & Bradstreet Number *
 - iii. Company Address *
 - iv. Company Address 2
 - v. City *
 - vi. County/Parish
 - vii. State/Province/Other
 - viii. Zip Code *
 - ix. Country *
- c. Click the Save button.

3. Modify your Highest-level U.S. or Foreign Parent Company

- a. Click the **Edit** icon within the Actions column to modify the U.S. or foreign parent company information.
- b. Click the **Delete** icon within the Actions columns to remove a U.S. or foreign parent company.
- c. Click the **Continue** button.

^{*}asterisks mark required fields



Step 1.1.2 User Registered in CDX with a Non-U.S. Company

- 1. Verify or update your highest-level foreign parent company information
 - a. The information you entered upon registering in CDX is used to pre-fill in the foreign company identity. Verify that the information displayed on the **Parent Company Information** page correctly identifies the highest-level foreign parent company for the site or update as needed.
 - b. Add the **Dun and Bradstreet Number** for your organization.
 - c. Click the Save button.
- 2. Add your highest-level U.S. parent company information
 - a. Click the **Add U.S. Parent Company** button.
 - b. Enter the required information for the highest-level U.S. parent company.
 - i. Company Name *
 - ii. Company Dun & Bradstreet Number *
 - iii. Company Address *
 - iv. City *
 - v. County/Parish *
 - vi. State/Province/Other *
 - vii. Zip Code *
 - c. Click the Save button.
- 3. Modify your Highest-level U.S. or Foreign Parent Company
 - a. Click the **Edit** icon within the Actions column to modify the U.S. or foreign parent company information.
 - b. Click the **Delete** icon within the Actions columns to remove a U.S. or foreign parent company.
 - c. Click the **Continue** button.

Step 1.2 Site Information

*asterisks mark required fields

- 1. Verify that the **Site Information** data is correct.
- 2. Enter the Site Dun & Bradstreet Number. *
 - Dun & Bradstreet number can contain only numeric characters or dashes and is of format XX-XXX-XXXX
- 3. Click the **Add NAICS Code** button to generate the Add NAICS Code window and provide at least one but no more than three NAICS code(s). *
 - a. Select the appropriate value from the NAICS Code * dropdown menu
 - b. Select the activity value from the Activity Classification drop-down menu
- 4. Click the **Add To List** button to populate the entered information into the NAICS code table.
- 5. Click the **Cancel** button to close the Add NAICS Code window without saving the entered information.
 - a. Click the **Edit** icon within the Actions column to modify a NAICS code entry
 - b. Click the **Delete** icon to remove a NAICS code entry
- 6. Click the Continue button to proceed to Step 2 Chemicals.



Step 2 Chemicals

Chemicals can be reported in different manners depending on how the manufacturing process was conducted. To add Chemicals to your Primary Form U, identify how you are reporting your chemicals. Refer to the following quick reference guides (QRGs) for specific instructions:

- CDR 2020 QRG Report a Manufactured or Imported Chemical when selecting the *My site is reporting the manufacture (including import), processing, and use of the chemical.* checkbox to indicate that this site is reporting all the information for this chemical.
- CDR 2020 QRG Report a Co-Manufactured Chemical as a Contracting Company when selecting the *My company contracted with a co-manufacturer to produce the chemical at their site.* checkbox to indicate that the manufacturing-related information will be reported by the producing company.
- CDR 2020 QRG Report a Co-manufactured Chemical as a Producing Company when selecting the *My site is reporting the production of the chemical for another company under a co-manufacturing contract.* checkbox to indicate that this site is reporting the production information on behalf of a contracting company under a co-manufacturing contract.

Once all the chemicals have been added to the form select the **Continue** button to proceed to **Step 3 – CBI Substantiation.**

Step 3 CBI Substantiation

Step 3.1 Review claims for accuracy

Step 3.1.1 Substantiation Status

- 1. Review the **Status** column to determine whether the CBI claims listed require substantiation answers.
 - a. A **grey checkmark** indicates that although the chemical or trade product contains confidential claims, these claims are exempt from substantiation and do not require further action.
 - b. A **green checkmark** indicates that all of the confidentiality claims either have the required substantiation answers provided or are exempted from the need for substantiation.
 - c. A chemical **without a checkmark icon** indicates that some or all confidentiality claims are incomplete and do not contain the corresponding substantiation answers. To provide the answers to the substantiation questions individually, proceed to **Step 3.1.2**. To copy previously completed substantiation answers, proceed to **Step 3.1.2.1**.
- 2. After all confidentiality claims have been substantiated as required, select the **Continue** button.
 - a. A pop-up message will display "Claims of confidentiality and, if required, substantiation of the claims are required at the time of submission (40 CFR 711.30(a)(1)). If you need to make additional confidentiality claims or substantiations, select the Cancel button to close this window and update the claims as needed. If your confidentiality claims and substantiations are complete, select the Continue button to move forward with the validation and submission of your form. Information not claimed as confidential in accordance with the requirements of 40 CFR 711.30 may be made public without further notice to the submitter."
 - b. If you are ready to submit your form, click the **Continue** button and proceed to Step 4. Otherwise click the **Cancel** button to return to the form and submit at a later time.



Step 3.1.2 Complete Substantiation Answers

- 1. If the chemical is missing a checkmark icon on the **Status** column, click the **Expand** (+) icon to view the sections that contain confidential claims.
 - a. There are up to two indicators for each section header:
 - i. (#/#) indicates the number of confidential claims made out of the total number of claims possible for that section.
 - ii. Checkmark icon, described in step 3.1.1, bullet 1.
 - b. If a section header has (0/0) listed, there are no confidential claims made in this section, and therefore substantiation answers are not needed.
 - c. If a section header has (3/6) listed, it means that you claimed 3 out of a total of 6 possible data elements as confidential data elements.
 - d. If a section header has a **green checkmark** displayed, this indicates that substantiation answers have been provided or are not required, and this section is complete.
 - e. If the **checkmark icon is not displayed**, this indicates that substantiation answers are missing and need to be provided.
- 2. Click the **section header** to expand the menu and see the data elements that require attention.
- 3. Scroll up or down to find the available links for elements claimed confidential.
- 4. Each element has a set of general questions with Yes or No selections and an explanation text box that allows you to provide the corresponding answer to the question. Complete each set of questions by selecting the appropriate radio button (Yes/No) for each question.
- 5. Check the corresponding CBI checkbox to claim the substantiation answer as confidential.
- 6. After completing all corresponding questions, click the **Save** button to continue with the next element.
- 7. After all the claims have been substantiated and the substantiations saved, the green checkmark will show on the **Status** column.

Step 3.1.2.1 Copy Substantiation Answers

Prerequisites: For at least one chemical in your submission, at least one green checkmark is shown in the Status column.

- 1. If the chemical or trade product is missing a status icon, click the **Copy** (paper stack) icon to trigger the copy functionality.
- 2. Select a chemical from the dropdown menu from which you wish to copy substantiation answers.
 - a. If a chemical does not display, it is not eligible to be copied.
- 3. Once a chemical has been selected, choose one of the following options:
 - a. Click the **Copy Substantiations** button to copy all applicable chemical substantiations from the selected chemical to the chemical or trade product you are editing.
 - b. Click the **Copy Substantiations to All** button to copy all applicable chemical substantiations from the selected chemical to all applicable chemicals or trade products in the form.
 - i. During the copy process, existing substantiation answers are not overwritten.
 - c. Click the **Cancel** button to discard and close the copy functionality.



Step 4 Review and Submit

Step 4.1 Submitting Official Information

- 1. The information has been pre-populated from the Primary Authorized Officials CDX registration. If the information listed is incorrect, please make the appropriate edits to the Authorized Officials user information in CDX registration.
- 2. Check the CBI checkbox to claim the submitters contact information as confidential.
- 3. Check the associated checkbox to confirm your acknowledgement of the legally responsible certification statement.*
- 4. Click the **Start Submission Process** button to activate the submission process.

Step 4.2 TSCA CBI Certification

- 1. Review the **TSCA CBI Certification** disclaimer and certify that all claims for confidentiality asserted with this submission are true and correct.
- 2. To accept, click the **Continue** button or click **Cancel** to return to the Submitting Official Information page.

Step 4.3 CDR Certification

- 1. Review the **CDR Certification** disclaimer.
- 2. To accept, click the **I Certify** button or click **Cancel** to return to the Submitting Official Information page.

Step 4.4 Validation

- 1. The application performs a validation check on the information provided.
 - a. If the form passes the validation check, the CDR Validation window displays with No Errors Found. Close the window and click the **Review & Submit** button to proceed to Step 4.5 or click **Cancel** to return to the Submitting Official Information page.
 - b. If the form fails the validation check, the CDR Validation window displays with the identified errors.
 - c. Review the identified errors and click the error hyperlink to navigate to the appropriate page and correct.
 - d. Click the Validate link again to re-validate a form.

Step 4.5 PDF Generation

- 1. The form automatically generates a PDF format of the CDR Electronic Reporting form. If your form contains more than 20 chemicals, a separate PDF will be generated for each 20 chemicals. Therefore, a form with 30 chemicals will generate 2 PDFs and a form with 105 chemicals will generate 6 PDFs.
- 2. Click the **Download** button to download a copy of an individual PDF.
 - a. The form automatically generates a PDF format of the CDR Electronic Reporting form. If your form contains more than 20 chemicals, a separate PDF will be generated for each 20 chemicals. Therefore, a form with 30 chemicals will generate 2 PDFs and a form with 105 chemicals will generate 6 PDFs.





3. Click the **Sign, Encrypt, and Submit** button to complete the submission process in Step 4.6 or click **Cancel** to return to the Chemical Summary page.

Step 4.6 CROMERR Signature

- 1. Click the **Accept** button on the pop-up window that reads: "I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."
- 2. Enter the CDX password and click the **Login** button.
- 3. Enter the answer to the Verification question and click the **Answer** button.
- 4. Click the **Sign** button.
- 5. Click the **Home** button to return to the Home page or **Logout** to leave the application.