

Questions and Answers from the Webinar given on 1/21/2010  
(Questions are grouped by the persons who submitted them)

This Q&A document does not establish requirements for electronic submission of Section 5 submissions. Rather it explains requirements and operation of existing regulations, e-PMN software and CDX, as well as recommending best practices.

**1. Q: As a consultant, how would I prepare the encrypted file for another company to submit?**

A. The e-PMN files are only encrypted in the final step just before transmitting to EPA; they are not encrypted at any other time. Therefore, draft files that you create can be shared via email or copied to a CD (optical disc) and mailed to your Authorized Official (AO) who will then send the document to EPA via CDX. CDX is used only to transmit documents to EPA; it is not used to transfer documents between preparers.

**Q: I run Windows 7 and the light software crashes every time I attempt to create a document. Has this software been tested on the Windows 7 operating system? If not, it needs to be ASAP as almost all new computers are running Windows 7.**

A. EPA designed the program to be platform independent. However, a person's personal settings may interfere with the operation of the software. You should contact the CDX Help Desk to determine why the e-PMN software is not running properly on your computer.

**2. Q: Authorized Officials often do not create the actual PMN document. How does this system and the e-PMN software allow for the file transfer of the final PMN that is actually prepared by a Support Registrant (e.g., consultant) so that it can be submitted by the authorized Official thru CDX?**

A. The e-PMN files are only encrypted in the final step just before transmitting to EPA; they are not encrypted at any other time. Therefore, draft files that you create can be shared via email or copied to a CD (optical disc) and mailed to your Authorized Official (AO) who will then send the document to EPA via CDX. CDX is used only to transmit documents to EPA; it is not used to transfer documents between preparers.

**3. Q: Can a company submit a supporting document or Notice of Commencement (NOC) after April 6, 2010 by CDX for a PMN that was submitted by paper prior to April 6, 2010?**

A. The e-PMN final rule (75 FR 773) states that older original submissions (submitted before April 6, 2010) require the old method of submitting NOCs and supporting documents. However, the e-PMN software may be used to create the paper documents.

**Q: If a company has two Authorized Officials, can authorized official 2 send in NOCs and supporting documents for a PMN submitted by authorized official 1? Does AO 2 have to be a Support Registrant to AO1?**

A. The e-PMN software does not compare information between submissions from the same company. Therefore, any AO for that company can submit the NOC. It does not have to be the AO of the original PMN. Also, AO 2 does not need to register as a Support Registrant (SR) for AO 1 to submit supporting documents if they both are from the same company.

4. **Q: Can CDX submission be used before the effective date of the rule?**

A. No, CDX may not be used to submit files to EPA until on or after the effective date of the rule, April 6, 2010.

**Q: Can an "agent" with power of attorney for an "Authorized Official" register and/or submit on behalf of the Authorized Official?**

A. No, an agent or an agent with power of attorney for an "Authorized Official" cannot submit on behalf of the Authorized Official. The company must authorize a person from within a company to be an Authorized Official.

5. **Q: Can more than 1 person from my company register with CDX for TSCA?**

A. Yes, there may be more than one person from the same company registered with CDX; there can be multiple Authorized Officials and multiple Support Registrants registered from the same company.

**Q: Is the organization name case sensitive?**

A. No, the organization name is not case sensitive. For example, the system will recognize Company Inc. and Company INC. as the same.

6. **Q: Can one person be an AO for more than one company. For example, can an AO from the parent company act as the AO for its subsidiaries?**

A. Yes, one person can be the Authorized Official for multiple companies; however, the AO must be a member of each company and must be registered as an AO for each of the companies. Also, the company responsible for the data must be the one listed in the submission.

**Q: Please give an example wherein an international address would be used (technical contact?)**

A. An international person may want to use the e-PMN software to submit supporting information (e.g., amendments, test data, a Letter of Support). However, all original

section 5 notices must be submitted by a U.S. contact with a domestic address. Technical contacts must also reside in the U.S.

**7. Q: Can one person be an authorized official for more than one company?**

A. Yes, one person can be the Authorized Official for multiple companies. The AO must be a member of each company. However, the company responsible for the data must be the one listed in the submission.

**8. Q: ID Type- what does DUNS stand for?**

A. During registration for TSCA, the system asks for the program ID type (Authorized Official (AO) or Support Registrant (SR)). The DUNS (Data Universal Numbering System) number is a unique nine-character number that identifies your organization. We do not use this number in either CDX Registration or in the e-PMN submission.

**9. Q: Can/should consultants/agents go through the first steps in the registration process (set up an account and download software) before having actual clients who would authorize them to work on their projects?**

A. The consultant/agent can start the CDX Registration process by opening an account in CDX. The consultant/agent cannot assign a role, generate registration forms, or download the version of the e-PMN software with encryption until the Authorized Official has completed registration. The consultant/agent can, however, download the version of the e-PMN software without encryption to familiarize themselves with the software and start preparing documents.

**10. Q: Does the e-PMN software support drawing detailed chemical structures? How are attachments included in the PMN submission?**

A. Chemical structures are added to the software as an attachment. Attachment file types are described in the "Helpful Hints for the Use of the eTSCA/e-PMN Submission Software" guidance document and the "e-PMN User's guide," available via the new chemicals homepage. For structures, typical file types would be image files, pdf files, mol files or skc (sketch) files. How the attachments are added to the e-PMN software will be discussed in the next webinar.

**Q: Will the method of paying the \$2500 fee remain in place or will this require electronic bank transfer?**

A. The method for submitting the user fee has not changed.

**11. Q: Does the software allow a draft to be created off-line, be circulated to company experts for company comments, have comments/revisions added, and then be finalized/approved internally before being submitted?**

A. A version of the e-PMN software without encryption (available through the EPA homepage) may be installed on any computer. This way, a draft submission can be sent to each reviewer (via email or CD) for them to open the file to add comments/revisions. The file is never "online" until it is submitted via CDX to EPA (it is encrypted just before submitting). Encryption of the file only occurs through the use of the version of the e-PMN software with encryption that must be downloaded from CDX after registration has been completed.

**Q: Where on the EPA website will the PPT/ audio from this webinar and the March webinar be posted .... on the new e-PMN form web page?**

A. The current PPT/audio will be available on the e-PMN form webpage ([www.epa.gov/oppt/newchems](http://www.epa.gov/oppt/newchems)) under the "NEW" icon.

**Q: How will notification about the March webinar be circulated/distributed?**

A. Information on the March Webinar will be posted on the New Chemicals website, ([www.epa.gov/oppt/newchems](http://www.epa.gov/oppt/newchems)), and a notification email will be sent with the Go-To-Meeting link and a separate toll free dial-in number.

**Q: Are there instructions someplace on how to share the PMN file/information among sites, USA and foreign clients, etc.? In other words, if you don't have a common electronic network, how do you share the draft PMN information?**

A. The submission is just a file. You can pass along the file via email or CD.

**12. Q: For multiple users in a company, should each user download the software to his/her individual PC or can a central server be used? If we use a server, is there a single ID for the company or does each user need to use an individual ID? Did we answer the ID question or is it inferred?**

A. The e-PMN software was designed to be installed on each individual's computer, not a server. It may run in a server environment, but be aware that some files are locked out for subsequent persons accessing the program. Each person for the company needs their own CDX login ID and password if they are to submit electronically to EPA.

**Q: Can we register now for CDX? If not, when will registration be available?**

A. Yes, you may start registering with CDX now.

**Q: Can the Authorized Official for the PMN submission be a different person than the AO for the Notice of Commencement?**

A. Yes, the AOs can be two different people, but they must be from the same company (unless the company changed hands since the notice was originally submitted).

**13. Q: I have a question about substance confidentiality. Scenario: Customer in Europe wants to file a PMN for my CBI substance. Past practice allowed me to send the CBI directly to the EPA to complete the customer's PMN application. Under the CDX system, will I need to register as the customer's Support Registrant and supply the confidential information that way? If so, how will the data be kept confidential from my customer? Thanks for clarification.**

A. The customer in Europe cannot file a PMN. Only manufacturers (which includes importers) that are incorporated, licensed, or doing business in the United States can file PMNs. However, the customer in Europe can download the e-PMN software without encryption, fill out their information, and send the US manufacturer the file (either via email or CD), which the US manufacturer will complete and submit to EPA. Alternatively, the customer in Europe can send the information to EPA directly, as a Letter of Support to the manufacturer's submission.

**Q: Can you please explain how companies can send confidential information to support a customer's PMN application (the old Letter of Support process).**

A. For Letters of Support (LOS), someone from the supporting company needs to register in CDX as an Authorized Official. After they are approved, they can download the e-PMN software with encryption and prepare the LOS supporting document. They should include the TS number for the corresponding submission so that EPA can match up the LOS with the original submission. Then, they can submit the LOS via CDX directly to EPA to protect their CBI.

**14. Q: How is a CD signed?**

A. The CD (optical disc) is not signed electronically. During the finalization steps in the e-PMN software, if you choose to submit via CD, a PDF of the necessary signature pages are created for you to print, sign, and send along with the CD which contains the finalized submission file.

**Q: You can create a PDF file at any time while preparing the PMN, correct?**

A. You can create a draft version PDF file at any time while preparing the PMN to make sure that everything is filled out correctly. Please note that this draft PDF will not be accepted if sent to EPA. You must go through the finalization steps to create a finalized submission which will be accepted by EPA.

**Q: After submitting registrations, will the legacy acknowledgement still go to the technical contact? Will the technical contact receive anything electronic?**

A. Yes, the acknowledgement letter will still be mailed to the technical contact. The Copy of Record, however, will be available for the AO/SR to download (whoever sent in the document).

**15. Q: I am a consultant who will probably be a Support Registrant for various authorized officials. I understand that I will only need to submit the electronic signature form once. Is there a way for me register with CDX to start this process, or must I wait for an Authorized Official that I work with to register first?**

A. No, you do not have to wait to create your account in CDX; however, you must wait for the Authorized Official's registration to be approved before you assign your role as the Support Registrant and obtain the registration forms. After you enter your company information, you can return later to choose the Program (TSCA) and assign your role.

**Q: I will be a Support Registrant for various companies. I am still unsure of how I register as a Support Registrant with multiple companies. Do I have to do a new registration with CDX each time or do I register with CDX once, then use add roles to add new companies?**

A. If you are to be a Support Registrant for multiple people, you have to create a new support role for each person. It would be easiest to sign up as a Support Registrant for your first approved Authorized Official and then send in your two forms: 1) the Electronic Signature Agreement (ESA) and 2) the "Authorization and Verification for Section 5 Notice and Support Submitter by Company Authorizing Official" form. After you have been approved, the CDX Registration database will not ask you to generate another ESA form for any additional support roles that you create; it will only ask you to create and print a Verification form for each Authorized Official. The "Add a new role" allows for the creation of another support relationship under the same CDX account. Multiple CDX accounts are not necessary.

**16. Q: I complete the PMN and send it to EPA. My manager signs the PMN -- Can we both be set up as Authorized Officials?**

A. If you are "authorized" by your manager to legally sign and be responsible for all documents submitted to EPA, then yes, you can be an Authorized Official. Otherwise, you can prepare the draft submission to completeness and pass the file to your manager to sign and submit the PMN to the Agency.

**17. Q: I consult for a foreign company that wants me to prepare and submit PMNs. They have an importer to act as AO. Do all three parties need to be registered in CDX?**

A. The US-based AO (the importer) will need a CDX account to sign/submit the final PMN. The consultant and the foreign company may register as Support Registrants to submit supporting documents. Registration is not necessary to create a draft submission.

**Q: If you submit by paper during the first year, is it necessary to be registered in CDX?**

A. No, you only need to register with CDX if you intend to submit via CDX; however,

you must use the e-PMN software to create the submissions even if they are created and submitted as paper.

**Q: I am preparing a PMN and I am not sure it will be submitted before April 6, 2010. It would seem that in order to be safe I should prepare it in the new software. Do you agree?**

A. If you can wait until after April 6th to submit then use the new software.

**18. Q: I had registered with CDX during the beta testing period. Do I need to register again?**

A. If you registered during the testing period, you only registered for the testing environment, not the production environment. So yes, you will need to re-register. Make sure that the site does not say "test" in the URL.

**Q: If someone downloads an unencrypted e-PMN form, fills it out and gives it to an Authorized Official, can it be submitted via CDX?**

A. Yes. The AO can open the file given to them, using the e-PMN software with encryption (which has connection with CDX) and submit the PMN to the Agency. NOTE: the e-PMN form is not encrypted until just before the form is transmitted to EPA.

**19. Q: I will be submitting e-PMNs for various sites but I do not "sit" at these sites or at corporate. What should be my address for registering? My office address? My individual plants addresses? My corporate address?**

A. The address that you enter into CDX when registering should be the same address as on the PMN form, i.e., where you can be reached.

**20. Q: If I CDX register my name without middle initial (not a required field) but do include my middle initial when I fill out an e-PMN (or vice versa), will the PMN be rejected?**

A. The PMN form does not have a separate field for the middle initial at this time, so only first and last name will be verified with CDX upon submission; therefore, this will not present a problem.

**Q: Is there a way for a company to deactivate an Authorized Official's registration if that person has left the company and is no longer authorized to make submissions on the company's behalf?**

A. The company should send a letter on letterhead to EPA (to the address on the Verification form) explaining the need for the deactivation.

**21. Q: If I have registered with CDX for submitting the IUR report do I have to register again?**

A. Yes, you will need to reregister. The registration for IUR does not carry over to the e-PMN registration.

**22. Q: If I register for the PMN system, will I need to register again for the IUR or will I only need to add the IUR program?**

A. The instructions for registering for the next IUR have not yet been determined.

**23. Q: Oregon Notaries do not use raised stamps. What do I do? Is that still permitted?**

A. The notary seal does not need to be raised; however, it must be signed and dated by the notary.

**Q: What do I do if I registered for the wrong "TSCA"?**

A. If you register for the wrong TSCA you should contact the CDX Helpdesk for further instruction.

**Q: My company typically has our outside TSCA consultant prepare the entire PMN dossier. Is that still permitted?**

A. You may still continue this practice. The consultant may give the prepared file to the registered AO who will electronically submit the document to EPA via CDX. During the first year (until April 6, 2011), the consultant may give a paper file to the AO official who will sign the form which he/she then can mail to EPA. The important point to remember is that the draft file must be created using either version of the e-PMN software.

**24. Q: Is there any problem with the Support Registrant and AO being the same person?**

A. There is no problem for a person to be registered as an AO for his/her company and also registered as a Support Registrant for an AO of another company.

**25. Q: Is this new e-PMN (CDX) form amenable to including structural diagrams (created outside the process)? Some of us had finally figured out how to include them in Adobe, e.g. Word, pdf, etc.**

A. Chemical structures are added to the software as an attachment. Attachment file types are described in the "Helpful Hints for the Use of the eTSCA/e-PMN Submission Software" guidance document and the "e-PMN User's guide." For structures, typical file

types would be image files, pdf files, mol files or skc (sketch) files. How attachments are added using the software will be discussed in the next webinar.

**26. Q: It was stated that only those pushing the button to submit need to register in CDX. Do Authorized Officials have to register in CDX though, even if they do not submit? Will they need to submit their signature? Is this how they are considered submitters?**

A. Under CROMERR and the e-PMN Rule, the signing of the submission (signature) occurs during the transmission of the document to EPA (after the button is pushed). Therefore, the Authorized Official (who normally now signs the document) has to register for CDX to submit.

**Q: Is the Authorized Official the only role who can submit original PMN documents or can a Support Registrant submit the original PMN?**

A. The Authorized Official is the only role that can submit the PMN type, the Biotechnology type, the NOC and a Letter of Support.

**Q: If I have a CDX active account as a submitter, will I have access to the ESA or is access to ESA available only when submitter links to an Authorized Official or as an Authorized Official?**

A. If you have a CDX active account with an EPA program other than TSCA, then you must register again under TSCA for the e-PMN software in order to receive a new ESA and Verification forms (depending on the roles) you select. Everyone registered in CDX (AOs and SRs) needs to submit only a one-time notarized ESA to EPA under the e-PMN Rule regardless of the number of roles they may have in CDX.

**27. Q: Just to clarify - anyone can download the forms and fill them out. However, if they have not registered as a Supporting Registrant, then they have to forward this information to the Authorized Official, who would then submit the documents, correct? This would include testing data, additional clarification, etc.**

A. Yes, anyone can download the e-PMN software without encryption to create the necessary files. Only those persons who have registered with CDX can submit via CDX. So, if you create a file containing supporting data and have not registered as a Support Registrant, you must pass along the file to a CDX registered AO for submission.

**28. Q: How about supporting documents such as the NOC for PMNs already submitted?**

A. NOCs and other supporting documents for PMNs with day 1 prior to April 6, 2010, must be submitted by paper. You can use the new software to prepare the information, but it must be submitted via paper.

**29. Q: Notaries in the state of Minnesota no longer have stamps that create a raised seal. It is just a print stamp. Is this going to create a problem?**

A. The notary seal does not need to be raised; however, it must be signed and dated by the notary.

**30. Q: Since we are no longer using the PDF version, should the person who is preparing the PMN be registered also? Not necessarily a "submitter" of the document?**

A. The preparer does not need to be registered; only the "submitter." A preparer does not need to register to download the e-PMN software without encryption to prepare documents unless he/she will be submitting these documents through CDX. At that time, he/she will need to register with CDX to obtain the e-PMN software with encryption in order to submit them to the Agency.

**31. Q: As a consultant, can one be both an Authorized official and Support Registrant for different companies (of course)?**

A. A consultant cannot be an Authorized Official. However, a consultant can register as a Support Registrant for many AOs from various companies.

**32. Q: What is the definition of "authorized official"?**

A. An Authorized Official is a person in a company legally responsible for the data in the notice submission. Generally this would be the person who signs the certification page on the paper version of the PMN form.

**33. Q: Where does the electronic signature agreement get mailed to?**

A. The ESA is sent to the same place as the Verification form. The address is at the bottom of the Verification forms.

**34. Q: Will the software work on all Mac computers?**

A. The software was designed to be operating system independent; it should work on a Mac computer. For problems, call the CDX Helpdesk.

**Q: As a consultant I prepare PMNs for clients. How shall I get registered?**

A. A consultant does not need to register to download the e-PMN software without encryption unless he or she will be submitting supporting information through CDX. At that time, he or she will need to register with CDX to obtain the e-PMN software with encryption in order to submit to the Agency via CDX.