CDX

Quick Reference Guide
Editing a Primary Form U

Prerequisites

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

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Creating a New Primary Form

1. Log in to CDX at https://cdx.epa.gov/.
2. Click the **Primary Authorized Official**; **Primary Agent/Consultant** or **Primary Support** link.
3. Select **TSCA Section 8(b) – Notice of Activity** from the drop-down on the **Chemical Information Submission System** page.
4. Click the **OK** button
5. Select a form type from the dropdown menu
6. Click **Create New Form**
7. Create a new password and confirm that password in the corresponding text boxes
8. Fill out the corresponding information for **Technical Contact, Chemical Information and Submitting Official Information**.

Accessing an Existing Primary Form

9. Log in to CDX at https://cdx.epa.gov/.
10. Click the **Primary Authorized Official**; **Primary Agent/Consultant** or **Primary Support** link.
11. Select **TSCA Section 8(b) – Notice of Activity** from the drop-down on the **Chemical Information Submission System** page.
12. Click the **Lock** icon within the Actions column for the desired site on the **Home** page.
13. Enter the passphrase on the **Enter Passphrase** page.
14. Click the **Continue** button.
15. If you fail to provide the correct passphrase 3 times, the **Hint** entered during the creation of a Primary Form step directions for how to request the passphrase will display.
16. If you are still unable to access the form, reach out to the appropriate individuals (i.e., Authorized Official or Primary Agent/Consultant who created the passphrase.
17. If you do not know your passphrase of the original form in order to amend, then you can **Create New Form** in order to make an amendment at this time.

Step 1 Form Information

Step 1.1 Identify a Technical Contact

Step 1.1.1 User Registered in CDX with a U.S. Company Identify
1. **Verify or update your Technical Contact information**
   a. The information you entered upon registering in CDX can be used to pre-fill in the technical contact information. Verify that the information displayed on the **Technical Contact Information** page correctly identifies the proper information or update as needed and populate the following fields:
      i. First Name
      ii. Last Name
      iii. Phone Number
   b. Click the **Continue** button.

Step 2 Chemicals
Reporting chemicals using SRS has been reduced to only be eligible to report ACCNO chemicals at this time.

Step 2.1 Editing chemicals for an existing submission
To edit the Chemicals select the pencil icon to access and make changes to each chemical. [This process will only be applicable to chemicals reported via ACCNO]

1. If you wish to change a chemicals claim for confidentiality, the radio options will be available to be changed at this time.
2. If you wish to withdraw your Notice of Activity for a particular chemical, the last radio option will be used for this action and an optional field for the case number will appear.
3. For an existing chemical claim for confidentiality, exemption questions will display to indicate how you wish to proceed with completing the additional CBI Substantiation questions required by the rule.
4. If you just wish to keep your existing CBI Substantiation explanations and answer the additional questions, select Exemption 1 and proceed to Section B of substantiation questions. [These exemptions and additional substantiation questions can be answered in CBI Substantiation tab as well]

Step 2.2 Adding chemicals for a new submission
This process will only apply if you forgot your passphrase and were required to create a new form to answer the additional substantiation questions. You will select the validation checkbox saying "**Verify that you are submitting this form as a replacement to a previous, inaccessible form.**" to indicate this is not the original submission for your chemicals. To add Chemicals select the "Add Chemical using SRS" button to access SRS and search for your chemical. [This process will only be applicable to chemicals reported via ACCNO]

1. Search for you chemical ID by using an ACCNO or the Generic Name options for your chemical.
2. After selecting the chemical, 3 radio options will appear:
   a. I am seeking to maintain an existing claim for confidentiality for this chemical.
   b. I am not seeking to maintain an existing claim for confidentiality for this chemical.
   c. I am seeking to withdraw this chemical substance identity.

3. If you select the first radio options, you will be prompted to complete the exemption questions and CBI substantiation question.
   a. You will be prompted to 3 new questions where you will select all that apply. If you do not choose to select either exemption question, you will be prompted to answer all substantiation questions including the additional questions required by the rule.
   b. If you select Exemption 1, you will be eligible to skip the first 6 substantiation questions and continue to Part B which contains the additional questions required by the rule.
4. If you select the last radio option to withdraw this chemical substance identity, you will be prompted with the option to enter the case number for the Notice of Activity that you submit during the original submission window.

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 **green checkmark** indicates that all of the confidentiality claims either have the required substantiation answers provided or are exempted from the need for substantiation.
   b. 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 **Validation** column, click the **Pencil** icon to view the sections that contain confidential claims.
   a. 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. 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.
4. After completing all corresponding questions, click the **Save** button to continue with the next element.

5. After all the claims have been substantiated and the substantiations saved, the green checkmark will show on the **Validation** 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.
4. After all the chemical claims that require substantiation display the green checks select the **Save Form** button.
5. The following statement 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.
6. The **Continue** button navigates back to the **Home** page.
7. Click on any additional form you wish to edit or
8. Click the **Logout** link to leave the application.