2016 Chemical Data Reporting Requirements & eCDR Web Reporting Tool

May 4th 2016

Marcus Aguilar

Environmental Protection Agency

Region 9 Pacific Southwest
Agenda

Outline

• Welcome and Overview
• TSCA Inventory and IUR/CDR Background
• 2016 CDR Requirements
• Demonstration of e-CDRweb reporting tool
• Downloading Copy of Record (CoR)/Uploading XML
• Creating an Amendment
• Questions and Answers
• Closing Remarks
Background on the TSCA Inventory and IUR/CDR

TSCA Chemical Substance Inventory (TSCA Inventory)
- Comprehensive listing of chemicals in commerce
- Chemicals added through the New Chemicals program
- Created in late 1970s and currently lists over 84,000 chemicals

Inventory Update Reporting (IUR) Rule
- EPA created IUR in 1986 to keep the TSCA Inventory current
- Used to collect updated information initially (1986-2002) on the manufacture and now (2006 on) also on the processing and use of a subset of TSCA Inventory-listed chemicals

Chemical Data Reporting (CDR) Rule
- In 2011, EPA renamed the IUR the Chemical Data Reporting (CDR) rule
- Transition from IUR to CDR was phased in over the 2012 and 2016 CDR reporting periods
Overview of 2016 CDR Requirements

• **When:** The submission period is June 1 to September 30, 2016; the next submission period will be in 2020

• **Who:** Manufacturers, including importers, of chemical substances:
  - Listed on the TSCA Inventory as of June 1, 2016
  - With a **production volume of 25,000 lbs** or greater at a site in at least one of the years 2012-2015*
  - Unless subject to certain TSCA regulatory actions, in which case the production volume is 2,500 lbs or greater
  - Are not eligible for a full or partial exemption from CDR

* This is a requirement phasing in for 2016
Overview of 2016 CDR Requirements

• **What:** Submitters must report for each chemical substance at a single site:
  -- Annual production volume for 2012-2015
  -- Certain manufacturing information for 2015
  -- Processing and use information for 2015
  -- Some exemptions may reduce reporting

• **How:** Submitters are required to report electronically

• **Where:** Submitters report through EPA’s CDX
  – Register with EPA’s Chemical Data Exchange (CDX)
  – Access e-CDRweb, the CDR reporting tool
  – Create and submit a separate Form U for each site
  – Submit completed Form U following instructions in e-CDRweb
To determine whether you are required to report, for each chemical substance that you domestically manufacture and/or import at a single site in any years between 2012-2015, consider the following steps:

**Step I:** Is Your Chemical Substance Subject to CDR?

**Step II:** Are You a Manufacturer Who is Required to Report?
The 2016 CDR: Determining Need to Report

Step I: Is Your Chemical Substance Subject to the CDR Rule?

- Is your chemical substance manufactured for commercial purposes?
- Is your chemical substance listed on the TSCA Inventory?
- Is your chemical substance potentially exempt from reporting?
- Is your chemical substance ineligible for exemption?
The 2016 CDR: Determining Need to Report

Chemical-Specific Exemptions -- 40 CFR 711.6

• **Full exemption from reporting**
  – Polymers, microorganisms, certain forms of natural gas & water
  – Naturally occurring chemical substances (not affected by TSCA actions)

• **Partial exemption from processing & use reporting**
  – Listed petroleum process streams
  – Chemicals of low current interest
    • Added via petition process for each specific chemical
    • May be reversed if interest in chemical changes

• **Not eligible for exemptions if subject to certain TSCA actions**
  – A rule proposed or promulgated under TSCA Sections 4, 5(a)(2), 5(b)(4), or 6,
  – Is the subject of an Enforceable Consent Agreement under 40 CFR 790,
  – An order in effect under TSCA Section 5(e) or 5(f),
  – Relief that has been granted under a civil action under TSCA Sections 5 or 7.
Step II: Are You a Manufacturer Who is Required to Report?

- Did you manufacture a chemical substance in an amount that exceeded the **reporting threshold** for the chemical?
  - Production volume (PV) of 25,000 lbs or 2,500 lbs
  - For 2016, PV must be considered for calendar years 2012-2015
- Did you manufacture a chemical substance subject to reporting due to its **TSCA regulatory status**?
- Do you qualify for a **Small Manufacturer** exemption?
- Do you qualify for any other reporting **exemptions**?
### The 2016 CDR: Determining Need to Report

#### Effect of TSCA Actions on Reporting Thresholds & Some Exemptions

<table>
<thead>
<tr>
<th>TSCA Action</th>
<th>CDR Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Reporting threshold (must be one or the other)</td>
</tr>
<tr>
<td></td>
<td>25,000 lb (40 CFR 711.8(a))</td>
</tr>
<tr>
<td>Not subject to any TSCA actions below</td>
<td>✓</td>
</tr>
<tr>
<td>TSCA section 4 rules *</td>
<td>✓</td>
</tr>
<tr>
<td>Enforceable Consent Agreements (ECAs)</td>
<td>✓</td>
</tr>
<tr>
<td>TSCA section 5(a)(2) SNURs *</td>
<td></td>
</tr>
<tr>
<td>TSCA section 5(b)(4) rules *</td>
<td></td>
</tr>
<tr>
<td>TSCA section 6 rules *</td>
<td></td>
</tr>
<tr>
<td>TSCA section 5(e) orders</td>
<td></td>
</tr>
<tr>
<td>TSCA section 5(f) orders</td>
<td></td>
</tr>
<tr>
<td>TSCA section 5 civil actions</td>
<td></td>
</tr>
<tr>
<td>TSCA section 7 civil actions</td>
<td></td>
</tr>
</tbody>
</table>

*Applies to both proposed & promulgated rules. †Full exemption for naturally occurring chemicals is not affected.
Small manufacturer exemption – 40 CFR 711.9

• A small manufacturer must meet one of the following
  – Total annual sales <$4 million, regardless of PV; OR
  – Total annual sales <$40 million and annual PV ≤ 100,000 lbs at a site
    • Reporting is required for any sites where annual PV > 100,000 lbs
  – Total annual sales means annual sales of submitter combined with a
    parent company, domestic or foreign (if any)

• A separate determination must be made for each chemical

• A person meeting the small manufacturer definition does not have to report for that chemical, unless it is the subject of:
  – A rule proposed or promulgated under TSCA Sections 4, 5(b)(4), or 6,
  – An order in effect under TSCA Section 5(e),
  – Relief granted under a civil action under TSCA Sections 5 or 7.
Site Identification Information

• Highest level U.S. parent company
  – Company name and address
  – Company Dun & Bradstreet number

• Manufacturing (including importing) site
  – Site name and address
  – Site Dun & Bradstreet number
  – Importers must report a U.S. address for the site
  – Upfront substantiation of CBI claims

• Technical contact(s) information
  – Name and address
  – Telephone number and email address
  – Is specific for each chemical
The 2016 CDR: What Information is Reported?

Manufacturing-Related Data

- Chemical Identity
  - CASRN and Chemical Name
  - Accession Number and Generic Chemical Name for CBI substances
- Production Volume (PV)

<table>
<thead>
<tr>
<th>2015 Data</th>
<th>2014 Data</th>
<th>2013 Data</th>
<th>2012 Data</th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestically Manufactured PV</td>
<td>Total PV only</td>
<td>Total PV only</td>
<td>Total PV only</td>
</tr>
<tr>
<td>Imported PV</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Indicate whether chemical physically at reporting site</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volume used at reporting site</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volume directly exported from reporting site</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
- Number of workers that are reasonably likely to be exposed (in ranges)
- Maximum concentration
- Indication of whether a manufactured chemical substance is being recycled, remanufactured, reprocessed or reused
- Physical form and percent production volume in the form
The 2016 CDR: What Information is Reported?

Processing- and Use-Related Data

- Required for production volumes of 25,000 lbs or more, at a site, unless subject to a reduced threshold of 2,500 lbs more at a site, unless otherwise exempted
- **Industrial Processing and Use**

<table>
<thead>
<tr>
<th>Report up to 10 unique combinations:</th>
<th>For each unique combination, report:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial function category</td>
<td>Industrial sector</td>
</tr>
</tbody>
</table>

- **Commercial and Consumer Use**

<table>
<thead>
<tr>
<th>Report up to 10:</th>
<th>For each unique category, report:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Product categories</td>
<td>Commercial or consumer?</td>
</tr>
</tbody>
</table>
Importers are subject to CDR

- Under TSCA, manufacture includes import
- If two or more persons meet the “importer” definition, they may determine who will report
- Site is defined for importers in 40 CFR 711.3
  - U.S. site of the unit directly responsible for importing
  - Must be a U.S. address, even if it is for an agent acting for the importer
- An importer will indicate whether each imported chemical is physically present at the reporting site
- If a mixture is imported, the importer reports the individual chemical components of the mixture
- Imported articles are exempt under 40 CFR 711.10(b)
The 2016 CDR: Special Topics

Byproduct chemical substances may be subject to CDR

• Defined as: A chemical substance produced without a separate commercial intent during the manufacture, processing, use, or disposal of another chemical substance or mixture. (40 CFR 704.3)

• Typically manufactured for a commercial purpose. (40 CFR 704.3)

• Reportable when used for a non-exempt commercial purpose. (40 CFR 720.30(h)(2), referenced by § 711.10(c))

• Exempted if its only commercial purpose is to:
  – Burn it as a fuel;
  – Dispose of it as a waste, including in a landfill or for enriching soil; or
  – Extract component chemical substances from it for commercial purposes. (40 CFR 720.30(g), referenced by § 711.10(c))
The 2016 CDR: Special Topics

Toll manufacturers are co-manufacturers

• Toll manufacturers & contracting manufacturers are defined as “co-manufacturers” under CDR

• The co-manufacturers must decide who will submit a report

• “Site” is defined for toll manufacturing as the location where the chemical is physically manufactured
  – Regardless of who submits, the tolling site must be reported
  – Different tolling sites require different reports, even if the same contracting company has the same chemical made at each site
  – If the tolling site is outside of the U.S., the chemical is an import

• The co-manufacturers will need to share information to report, because each has part of the required information
The 2016 CDR: Important to Know

• Reporting is site-specific:
  – One Form U per site
  – One or more chemical substance reports on each Form U

• Reporting standard is “known to or reasonably ascertainable by” for all data

• Confidential Business Information (CBI) claims - upfront substantiation is required for:
  – Site and chemical identity claims
  – Processing and use information claims
Access 2016 CDR reporting information, including: instructions, fact sheets, webinars
How To Report

Register with EPA’s Central Data Exchange (CDX)
- Register for organizations and sites
- Update current registration as needed
- Update current site information

Access TSCA Chemical Data Reporting
- To complete Form U
- One Form U per site
- Includes step by step submission instructions
Welcome

Welcome to the Environmental Protection Agency (EPA) Central Data Exchange (CDX) - the Agency’s electronic reporting site. The Central Data Exchange concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.

Warning Notice and Privacy Policy

Warning Notice

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

1. you are accessing U.S. Government information and information systems that are provided for official U.S. Government purposes only;
2. unauthorized access to or unauthorized use of U.S. Government information or information systems is subject to criminal, civil, administrative, or other lawful action;
3. the term U.S. Government information system includes systems operated on behalf of the U.S. Government;
4. you have no reasonable expectation of privacy regarding any communications or information used, transmitted, or stored on U.S. Government information systems;
## Central Data Exchange (CDX)

### Services

<table>
<thead>
<tr>
<th>Status</th>
<th>Program Service Name</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>CROMERRTEST: CROMERR Test Sandbox</td>
<td>Development Sandbox</td>
</tr>
<tr>
<td></td>
<td>CSPP: Submissions for Chemical Safety and Pesticide Programs</td>
<td>Primary Authorized Official</td>
</tr>
<tr>
<td></td>
<td>CSPP: Submissions for Chemical Safety and Pesticide Programs</td>
<td>Secondary Authorized Official</td>
</tr>
<tr>
<td></td>
<td>TRIMEweb: Toxic Release Inventory Made Easy Web</td>
<td>TRI-MEweb</td>
</tr>
<tr>
<td></td>
<td>TSCA: TSCA</td>
<td>PMN Client Download and View Support Registrants</td>
</tr>
</tbody>
</table>

### CDX Service Availability

- See the status for all program services

### News and Updates

- No news/updates.
The Chemical Data Reporting (CDR) rule requires manufacturers (including importers) to report to EPA information concerning the manufacturing, processing, and use of certain chemical substances listed on the TSCA Chemical Substances Inventory. Click OK to complete the CDR form, Form U, using the e-CDRweb software.

The software includes embedded help files and a downloadable user manual to guide you through the CDR submission process. Submit information for all reportable chemical substances at your site in one Form U. Note that a separate CDR submission is required for each reporting site. If you are not reporting on CDR, please select a different application in the drop-down menu.

**Paperwork Reduction Act Notice**

The annual public burden for this collection of information, which is approved under OMB Control Number 2070-0162, varies depending on the submitter's experience with CDR reporting, and is estimated at 91-139 hours per response for a full report and 26-66 hours per response for a partial report. A full report includes manufacturing, processing, and use information. A partial report includes manufacturing information and does not include processing and use information. According to the Paperwork Reduction Act, "burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For this collection it includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information; and disclosing or providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number. The OMB control number for this collection appears above. In addition, the OMB control numbers for EPA's regulations, after initial display in the final rule, are listed in 40 CFR part 9. Exp. 10/31/2018.
Welcome to the e-CDRweb application.

Form U Access

Create, modify, or delete a Form U, the form for reporting under TSCA CDR, by clicking the Form U Access tab.

User Management

Manage the access rights of Supports per site. For every Support in each site, the Authorized Official may give him/her the ability to edit (but not create or delete) the form.

Resources

Access a downloadable user guide specific to your user role that describes the e-CDRweb application. Also provides access to websites and other sources for helpful information.

Primary Authorized Official

A Primary Authorized Official has the ability to create, amend, and unlock forms (parts 1-3). The Authorized Official is the only person who can submit completed forms electronically. Finally, the Authorized Official has the ability to assign Supports to individual sites.
From this page, you can access 2012 and 2016 CDR Form Us for which you are either an Authorized Official or Support. The default view lists 2016 Form Us.

To open a Form U, click on the site name in the table below. The status of each Form U is located in the Status column:

- Not Started – indicates the Form U has not been started. Only an Authorized Official can initiate a Form U.
- In Progress – indicates the Form U has been started but has not been submitted. Authorized Officials or Supports can access Form Us that are in progress.
- Submitted – indicates the Form U has been submitted and is locked. Unlock the Form U by clicking the lock icon and entering the correct passphrase when prompted. Be aware that resubmitting the Form U is amending and overwriting the previous submission. Only Authorized Officials can submit Form Us.

To download a Copy of Record for a submitted Form U, click the green arrow icon and enter your passphrase when prompted.

<table>
<thead>
<tr>
<th>Reporting Year</th>
<th>Site</th>
<th>Address</th>
<th>Status</th>
<th>Modify Date</th>
<th>Submission Date</th>
<th>Copy of Record</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>SUN CLEANERS - COURTHOUSE PLAZA</td>
<td>10394 WILLARD WAY FAIRFAX, VA 2203000000</td>
<td>In Progress</td>
<td>11/20/2015</td>
<td>11/20/2015</td>
<td>&lt;</td>
<td>x</td>
</tr>
<tr>
<td>2016</td>
<td>SUNOCO SERVICE STATION</td>
<td>10383 LEE HWY FAIRFAX, VA 22030-2249</td>
<td>Submitted</td>
<td>11/19/2015</td>
<td>11/19/2015</td>
<td>&lt;</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>WEST OX GARAGE</td>
<td>4060 ALLIANCE DRIVE FAIRFAX, VA 22030-6683</td>
<td>In Progress</td>
<td>11/16/2015</td>
<td>11/16/2015</td>
<td>&lt;</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>FAIR CENTER CLEANERS</td>
<td>13079 FAIR LAKES SHOPPING CTR FAIRFAX, VA 2203300000</td>
<td>Submitted</td>
<td>11/16/2015</td>
<td>11/16/2015</td>
<td>&lt;</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>PUBLICATION TECH CORP</td>
<td>11212 WAPLES MILL RD STE 103 FAIRFAX, VA 22030</td>
<td>In Progress</td>
<td>02/10/2016</td>
<td>02/10/2016</td>
<td>&lt;</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>EXXON CO USA NUMBER 24502</td>
<td>13060 FAIRLAKES SHOPPING CTR FAIRFAX, VA 22033-5180</td>
<td>Complete</td>
<td>02/09/2016</td>
<td>02/09/2016</td>
<td>&lt;</td>
<td></td>
</tr>
</tbody>
</table>
CREATE PASSPHRASE

Please create a passphrase that has minimum of 8 characters and maximum of 20 characters in length. To better protect your Form U, your passphrase should contain a combination of letters and numbers. Your passphrase may include spaces, but should not contain special characters (e.g., + or *).

New Passphrase: 
Confirm New Passphrase: 

A passphrase can only be created by the Authorized Official for a reporting site's Form U. Your passphrase will be used as an encryption key to protect the contents of your data. As an Authorized Official, you are responsible for remembering your passphrase and distributing it to only authorized Supports for your site.

Note: If you lose or forget your passphrase, you will not be able to access your CDR Form U to print, submit, or make changes. You will need to initiate and complete a new Form U, at which time you will create a new passphrase. For security reasons, EPA's system administrator will not have access to your passphrase and will not be able to retrieve or reset it.
SECTION 1.A - PARENT COMPANY INFORMATION

Parent company information is populated from the information reported in CDX by the Authorized Official. If this is not the correct parent company for this site, take the action that is applicable:

1. Return to CDX registration and update the parent company and address information. The corrected information will be updated in this form.
2. Check the below box if your parent company is different from the organization you registered under in CDX and edit the information on this screen.

☐ Check this box if your parent company differs from the organization you registered under in CDX, and edit the information on this page.

<table>
<thead>
<tr>
<th>Parent Company Name (1.A.1)</th>
<th>TEST ORGANIZATION LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parent Company Dun &amp; Bradstreet Number (1.A.2)</td>
<td></td>
</tr>
<tr>
<td>Parent Company Address (1.A.3-4)</td>
<td>1025 LEESBURG PIKE</td>
</tr>
<tr>
<td>City (1.A.5)</td>
<td>FALLS CHURCH</td>
</tr>
<tr>
<td>County/Parish (1.A.6)</td>
<td></td>
</tr>
<tr>
<td>State (1.A.7)</td>
<td>VA</td>
</tr>
<tr>
<td>Zip Code (1.A.8)</td>
<td>22033</td>
</tr>
</tbody>
</table>

Next
SECTION 1.A - PARENT COMPANY INFORMATION

Parent company information is populated from the information reported in CDX by the Authorized Official. If this is not the correct parent company for this site, take the action that is applicable:

1. Return to CDX registration and update the parent company and address information. The corrected information will be updated in this form.
2. Check the below box if your parent company is different from the organization you registered under in CDX and edit the information on this screen.

- Unchecking this box will cause the fields on this screen to default to the information entered during CDX registration.

<table>
<thead>
<tr>
<th>Parent Company Name (1.A.1)</th>
<th>TEST ORGANIZATION LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parent Company Dun &amp; Bradstreet Number (1.A.2)</td>
<td></td>
</tr>
<tr>
<td>Parent Company Address (1.A.3)</td>
<td>1025 LEESBURG PIKE</td>
</tr>
<tr>
<td>Parent Company Address 2 (1.A.4)</td>
<td></td>
</tr>
<tr>
<td>City (1.A.5)</td>
<td>FALLS CHURCH</td>
</tr>
<tr>
<td>County/Parish (1.A.6)</td>
<td>VA</td>
</tr>
<tr>
<td>State (1.A.7)</td>
<td>22033</td>
</tr>
<tr>
<td>Zip Code (1.A.8)</td>
<td></td>
</tr>
</tbody>
</table>

Next
**SECTION 1.B - SITE INFORMATION**

- **EPA Registry ID**: 110090071280
- **Site Name (1.B.1)**: TEST FACILITY 999
- **Site Dun & Bradstreet Number (1.B.2)**: 456 MAIN STREET SUITE 90
- **Site Address (1.B.3-4)**: FAIRFAX
- **City (1.B.5)**: VA
- **County/Parish (1.B.6)**: 22030
- **State (1.B.7)**: VA
- **Zip Code (1.B.8)**: 22030
SECTION 1.C - TECHNICAL CONTACT INFORMATION

To identify a technical contact, please enter information in the below required fields or click the 'Copy CDX Registration' button to copy your contact information entered during CDX registration.

To select the entered technical contact as the default contact for all chemical substances at this site, select the 'Default Contact' checkbox.

Click here to copy your information from CDX Registration: Copy CDX Registration

Prefix (1.C.1)  Default Contact
First Name (1.C.1)
Middle Initial (1.C.1)
Last Name (1.C.1)
Suffix (1.C.1)
Company Name (1.C.2)
Telephone (1.C.3)
(Do not enter any dashes (-) in Phone Number field above)
Email Address (1.C.4)
Mailing Address 1 (1.C.5)
Mailing Address 2 (1.C.6)
City (1.C.7)
State (1.C.8)
Zip Code (1.C.9)
Country (1.C.10)
SECTION 2.A - CHEMICAL IDENTIFICATION

CBI for Chemical Identification (2.A.1)
Chemical Identifying Number (2.A.2)
Number ID Code (2.A.3)
Chemical Name (2.A.4)

Search

Chemical Report Folder Alias

Search EPA’s Substance Registry Services (SRS) for the specific, currently correct Chemical Abstracts (CA) Index name as listed on the TSCA Inventory and/or the correct corresponding Chemical Abstract Services Registry Number (CASRN) for each reportable chemical substance at your site. For easier navigation, you may add an alias for this chemical. This alias will appear on the navigation panel on the left hand side.

For additional information about regulatory or other chemical characteristics that affect CDR requirements, please click on the "Resources" tab of this webpage and then select the "Additional Regulatory Information" link.
SUBSTANCE REGISTRY SERVICES SEARCH

Enter the specific or partial, currently correct Chemical Abstracts (CA) Index name as listed on the TSCA Inventory and/or the exact corresponding Chemical Abstract Services Registry Number (CASRN) for each reportable chemical substance at your site. Click Search and select the appropriate CA Index name/ CASRN combination from EPA's Substance Registry Services (SRS).

Please search by CASRN or CA Index Name
1. CASRN: 
   Matches exactly
   
2. CA Index Name or Other Synonym:
   Begins with
   
   Search

OR

Enter the specific or partial, currently correct Accession Number as listed on the TSCA Inventory and/or the exact or partial corresponding Generic Name for each reportable chemical substance at your site. Click Search and select the appropriate Accession Number/ Generic Name combination from EPA's Substance Registry Services (SRS).

Please search by Accession Number and/or Generic Name
1. Accession Number:
   Begins with
   
2. Generic Name:
   Begins with
   
   Search
CBI SUBSTANTIATION QUESTIONS

Site Identification (2.B.2)

1. Has site information been linked with a chemical identity in any other Federal, state, or local reporting scheme? For example, is the chemical identity linked to a site in a filing under the EPCRA section 311, namely, through a Material Safety Data Sheet (MSDS)? If so, identify such schemes. Was the linkage claimed as confidential in any of these instances?

2. What harmful effect, if any, to your competitive position do you think would result from disclosure of the identity of the site and the chemical substance? How could a competitor use such information? Would the effects of disclosure be substantial? What is the causal relationship between the disclosure and the harmful effects?

Save  Cancel
### Imported Chemical Never Physically at Site (2.B.7)

- **Volume Used on Site (2.B.6)**: [Input Field]
- **Volume Exported (2.B.9)**: [Input Field]

### Number of Workers (2.B.10)

- **Max Concentration (2.B.11)**: [Input Field]

### Is chemical being recycled, remanufactured, reprocessed, reused, or reworked? (2.B.12)

<table>
<thead>
<tr>
<th>Physical Form</th>
<th>Applies</th>
<th>CBI</th>
<th>% Production Volume of 0 lbs.</th>
<th>CBI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dry Powder (2.B.13)</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
</tr>
<tr>
<td>Pellets or Large Crystals (2.B.14)</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
</tr>
<tr>
<td>Water or Solvent Wet Solid (2.B.15)</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
</tr>
<tr>
<td>Other Solid (2.B.16)</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
</tr>
<tr>
<td>Gas or Vapor (2.B.17)</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
</tr>
<tr>
<td>Liquid (2.B.18)</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
</tr>
<tr>
<td>Not Known or Reasonably Ascertainable (NKRA) (2.B.19)</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
<td>[Input Field]</td>
</tr>
</tbody>
</table>

### Report Past Production Volume (2.B.20)

<table>
<thead>
<tr>
<th>Year</th>
<th>Production Volume</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>[Input Field]</td>
</tr>
<tr>
<td>2013</td>
<td>[Input Field]</td>
</tr>
<tr>
<td>2012</td>
<td>[Input Field]</td>
</tr>
</tbody>
</table>
## SECTION 3.A - INDUSTRIAL PROCESSING AND USE

Not Applicable

<table>
<thead>
<tr>
<th>Type of Process or Use</th>
<th>Sector(s)</th>
<th>Industrial Function Category</th>
<th>Percent Production Volume</th>
<th>Number of Sites</th>
<th>Number of Workers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Code</td>
<td>CBI</td>
<td>Code</td>
<td>CBI</td>
<td>Code</td>
<td>CBI</td>
</tr>
<tr>
<td>(3.A.1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.A.2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.A.3)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.A.4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.A.5)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.A.6)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.A.7)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.A.8)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.A.9)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.A.10)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### SECTION 3.B - CONSUMER AND COMMERCIAL USE

<table>
<thead>
<tr>
<th>Product Category</th>
<th>Consumer or Commercial or both</th>
<th>Used in Products Intended for Children?</th>
<th>Percent Production Volume</th>
<th>Maximum Concentration</th>
<th>Number of Commercial Workers Reasonably Likely to be Exposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>(3.B.1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.B.2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.B.3)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.B.4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.B.5)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.B.6)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.B.7)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.B.8)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.B.9)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3.B.10)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
CBI SUBSTANTIATION SUMMARY

No fields requiring substantiation have been marked CBI.
Demo of e-CDRweb Reporting Tool

Submission Process
SUBMISSION PROCESS: PDF GENERATION

Validation → PDF Generation → CROMERR → Submit

Generating a finalized PDF file of your submission

Processing. Please wait...
SUBMISSION PROCESS: PDF GENERATION

Your PDF preview transaction was successful.

View PDF  Continue
I certify, under penalty of law, that this document and all attachments were prepared under my direction of supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted 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.
Please login with your CDX password:
What is your favorite song?
I hereby certify to the best of my knowledge and belief that (1) all information entered on this form is complete and accurate; and (2) any confidentiality claims are true and correct as to that information for which they have been asserted. Any knowing and willful misinterpretation is subject to criminal penalty pursuant to 18 USC 1001.
The submission was sent to the EPA. The Copy of Record link to allow for download of the Copy of Record and signature for this submission will appear in the Forms list when the EPA receives and processes your submission.

Finish
Extract XML
<table>
<thead>
<tr>
<th>Reporting Year</th>
<th>Site Name</th>
<th>Address</th>
<th>Status</th>
<th>Modify Date</th>
<th>Submission Date</th>
<th>Copy of Record</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>SUN CLEANERS - COURTHOUSE PLAZA</td>
<td>10394 WILLARD WAY FAIRFAX, VA 220300000</td>
<td>In Progress</td>
<td>11/20/2015</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>SUNOCO SERVICE STATION</td>
<td>10383 LEE HWY FAIRFAX, VA 22030-2249</td>
<td>In Progress</td>
<td>11/19/2015</td>
<td>11/19/2015</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>WEST OX GARAGE</td>
<td>4900 ALLIANCE DRIVE FAIRFAX, VA 22030-6563</td>
<td>In Progress</td>
<td>11/16/2015</td>
<td>11/16/2015</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>CVS PHARMACY #1417</td>
<td>13031 LEE-JACKSON HWY FAIRFAX, VA 22033</td>
<td>Not Started</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>FAIR CENTER CLEANERS</td>
<td>13079 FAIR LAKES SHOPPING CTR FAIRFAX, VA 220330000</td>
<td>Submitted</td>
<td>11/16/2015</td>
<td>11/16/2015</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>GREENBRIAR CLEANERS</td>
<td>13039C LEE JACKSON HWY FAIRFAX, VA 22033-2047</td>
<td>Not Started</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>GREENBRIAR EAST ELEMENTARY SCHOOL</td>
<td>13000 POINT PLEASANT DR FAIRFAX, VA 22033</td>
<td>In Progress</td>
<td>08/21/2015</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>HECHINGER #139</td>
<td>13047 FAIR LAKES BLVD FAIRFAX, VA 22033</td>
<td>Not Started</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>INOVA FAIR OAKS HOSPITAL</td>
<td>3600 JOSEPH SIEWICK DR FAIRFAX, VA 220330000</td>
<td>Not Started</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>PUBLICATION TECH CORP</td>
<td>11212 WAPLES MILL RD STE 103 FAIRFAX, VA 22030</td>
<td>In Progress</td>
<td>02/10/2016</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>EXXON CO USA NUMBER 24502</td>
<td>13060 FAIRLAKES SHOPPING CTR FAIRFAX, VA 22033-5180</td>
<td>Complete</td>
<td>02/09/2016</td>
<td>02/09/2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>TITAN VIRGINIA READY MIX LLC - CENTREVILLE</td>
<td>15718 LEE HWY CENTREVILLE, VA 20120</td>
<td>Not Started</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ENTER PASSPHRASE

Please enter your Form U passphrase and click **Next**

Forgot Your Passphrase?

For security reasons, EPA's system administrator does not have access to your passphrase and cannot retrieve or reset it. If you have forgotten your passphrase, your site's Authorized Official must initiate and complete a new Form U. The Authorized Official will be able to create a new passphrase for the new Form U.
CROSS-MEDIA ELECTRONIC REPORTING REGULATION (CROMERR) LOGIN

Please login with your CDXweb password:

Password: 

[Buttons] Cancel  Ok
CROSS-MEDIA ELECTRONIC REPORTING REGULATION (CROMERR) SECURITY QUESTION

What is your favorite book?

Cancel  Ok
DOWNLOAD COPY OF RECORD

You can now download the Copy of Record for the Form U Submission!

Download Copy of Record:

<table>
<thead>
<tr>
<th>File Name</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copy of Record</td>
<td></td>
</tr>
</tbody>
</table>

Download Substantiation Attachments:

<table>
<thead>
<tr>
<th>File Name</th>
<th>File Size</th>
<th>Actions</th>
</tr>
</thead>
</table>

Home
Extract XML

- Open the .zip file
- Extract all files, including:
  - CDR .xml file
  - CDR PDF
Upload XML
UPLOAD XML

Click the Upload XML File button below and select the XML file you have populated with CDR information.

Upload XML File

Warning: When importing an XML file into the current form, if XML validation is passed, all form contents will be overwritten with the information stored within the imported XML file.
UPLOAD XML

Your XML upload was successful!
XML data has been populated in the form. (Larger data sets may take more time to populate past the initial load checks.)
Amending a Form
To download a Copy of Record for a submitted Form U, click the green arrow icon and enter your passphrase when prompted.

<table>
<thead>
<tr>
<th>Reporting Year</th>
<th>Site</th>
<th>Address</th>
<th>Status</th>
<th>Modify Date</th>
<th>Submission Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>SUN CLEANERS - COURTHOUSE PLAZA</td>
<td>10394 Willard Way, Fairfax, VA 22030-00000</td>
<td>In Progress</td>
<td>11/20/2015</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>SUNOCO SERVICE STATION</td>
<td>10338 Lee Hwy, Fairfax, VA 22030-2249</td>
<td>Submitted</td>
<td>11/19/2015</td>
<td>11/19/2015</td>
</tr>
<tr>
<td>2016</td>
<td>WEST OX GARAGE</td>
<td>4060 Alliance Drive, Fairfax, VA 22030-8663</td>
<td>In Progress</td>
<td>11/16/2015</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>CVS PHARMACY #1417</td>
<td>13031 Lee-Jackson Hwy, Fairfax, VA 22033</td>
<td>Not Started</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>FAIR CENTER CLEANERS</td>
<td>13079 Fair Lakes Shopping Ctr, Fairfax, VA 22030</td>
<td>Submitted</td>
<td>11/10/2015</td>
<td>11/10/2015</td>
</tr>
<tr>
<td>2016</td>
<td>GREENBRIAR CLEANERS</td>
<td>13039 C Lee Jackson Highway, Fairfax, VA 22033-2047</td>
<td>In Progress</td>
<td>03/25/2016</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>GREENBRIAR EAST ELEMENTARY SCHOOL</td>
<td>13006 Point Pleasant Dr, Fairfax, VA 22033</td>
<td>In Progress</td>
<td>08/21/2015</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>HECHINGER #139</td>
<td>13047 Fair Lakes Blvd, Fairfax, VA 22033</td>
<td>Not Started</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>INOVA FAIR OAKS HOSPITAL</td>
<td>3500 Joseph Sievick Dr, Fairfax, VA 220300000</td>
<td>Not Started</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>PUBLICATION TECH CORP</td>
<td>11212 Waples Mill Rd Ste 103, Fairfax, VA 22030</td>
<td>In Progress</td>
<td>02/10/2016</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>EXXON CO USA NUMBER 24502</td>
<td>13060 Fairlakes Shopping Ctr, Fairfax, VA 22033-5180</td>
<td>Complete</td>
<td>02/09/2016</td>
<td>02/09/2016</td>
</tr>
<tr>
<td>2016</td>
<td>TITAN VIRGINIA READY MIX LLC - CENTREVILLE</td>
<td>16718 Lee Hwy, Centreville, VA 20120</td>
<td>Not Started</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Authorized Officials can submit Form Us.

To download a Copy of Record for a submitted Form U, click the green arrow icon and enter your passphrase when prompted.

<table>
<thead>
<tr>
<th>Site</th>
<th>Address</th>
<th>Status</th>
<th>Modify Date</th>
<th>Submission Date</th>
<th>Copy of Record</th>
</tr>
</thead>
<tbody>
<tr>
<td>FAIR CENTER CLEANERS</td>
<td>13079 FAIR LAKES SHOPPING CTR FAIRFAX, VA 220300000</td>
<td>Submitted</td>
<td>11/16/2015</td>
<td>11/16/2015</td>
<td></td>
</tr>
<tr>
<td>GREENBRIAR CLEANERS</td>
<td>13030C LEE JACKSON HIGHWAY FAIRFAX, VA 22033-2047</td>
<td>In Progress</td>
<td>03/25/2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GREENBRIAR EAST ELEMENTARY SCHOOL</td>
<td>13006 POINT PLEASANT DR FAIRFAX, VA 22033</td>
<td>In Progress</td>
<td>08/25/2015</td>
<td></td>
<td></td>
</tr>
<tr>
<td>HECHINGER #139</td>
<td>13047 FAIR LAKES BLVD FAIRFAX, VA 22033</td>
<td>Not Started</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>INova FAIR OAKS HOSPITAL</td>
<td>3600 JOSEPH SIEWICK DR FAIRFAX, VA 220330000</td>
<td>Not Started</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PUBLICATION TECH CORP</td>
<td>11212 WAPLES MILL RD STE 103 FAIRFAX, VA 22030</td>
<td>In Progress</td>
<td>02/10/2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EXXON CO USA NUMBER 24502</td>
<td>13060 FAIRLAKES SHOPPING CTR FAIRFAX, VA 22033-5100</td>
<td>Complete</td>
<td>02/09/2016</td>
<td>02/09/2016</td>
<td></td>
</tr>
<tr>
<td>TITAN VIRGINIA READY MIX LLC CENTREVILLE</td>
<td>15718 LEE HWY CENTREVILLE, VA 20120</td>
<td>Not Started</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This will begin the amendment process. Once this form is unlocked, the only way to lock it again is to resubmit to the EPA. Do you wish to proceed?

[OK] [Cancel]
ENTER PASSPHRASE

Please enter your Form U passphrase and click Next

Forgot Your Passphrase?

For security reasons, EPA's system administrator does not have access to your passphrase and cannot retrieve or reset it. If you have forgotten your passphrase, your site's Authorized Official must initiate and complete a new Form U. The Authorized Official will be able to create a new passphrase for the new Form U.

[Buttons: Cancel, Next]
AMENDMENT AND LATE SUBMISSION EXPLANATION

Why are you amending this form or submitting it late? Please note that you should only complete this screen if you are submitting an amendment or a late submission.
Resources

• Within Reporting Tool
  – Resources screen within CDR web application provides useful links and user guides

• Contacts
  – Specific CDR Reporting Questions: eCDRweb@epa.gov
  – TSCA Hotline: 202-554-1404 or TSCA-Hotline@epamail.epa.gov
  – CDX Helpdesk: 888-890-1995 or helpdesk@epacdx.net

• Additional Assistance:
  – Future training webinars are scheduled for May and June 2016
  – Training slides and other materials are available on the CDR website: www.epa.gov/cdr

Today’s PowerPoint presentation is available to download at: https://www.epa.gov/chemical-data-reporting/how-report-under-chemical-data-reporting
Questions & Answers

• Questions?

• Marcus Aguilar
  – EPA Region 9 Pacific Southwest, Land Division
  – AZ, CA, HI, NV, PIT
• Aguilar.marcus@epa.gov
• (415) 972-3428
TSCA Reform

- H.R. 2576 (June 24, 2015)
- S. 697 (S.8796) (December 17, 2015)
- Letter from EPA Administrator McCarthy January 20, 2016
Hazardous Waste

- www.epa.gov/hw
- Hazardous Waste Program Areas
  - Identification
- Initiatives and Special Projects
  - Tailoring the Rules for Pharmaceutical Wastes
- Contact Us