



**Section 12(b) Export Notification
Application User Guide – Primary
Authorized Official**

Environmental Protection Agency

Office of Pollution Prevention and Toxics

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Any company who exports or intends to export a chemical substance or mixture subject to certain TSCA regulations is required to notify EPA. Under TSCA Section 12(b), exporters are required to notify EPA of their intention to export a chemical substance or mixture regulated under certain parts of the law. EPA, in turn, provides information about such exported chemical and EPA's related regulatory actions, to the importing government.

The full text of the implementing regulation can be found at 40 CFR part 707 and 799 also in the Federal Register of November 14, 2006 (71 FR 66234) (FRL-8101-3) and in the rulemaking docket, identified under EPA docket ID No. EPA-HQ-OPPT-2005-0058-0067 and available online at <https://www.regulations.gov>.

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This document presents the user guide for the Office of Pollution Prevention and Toxics (OPPT) Section 12(b) Export Notification submission process. This document is the user guide for the Primary Authorized Official of the Section 12(b) application.

The Section 12(b) application is the electronic, web-based tool provided by Environmental Protection Agency (EPA) for the submission of Section 12(b) data. As a Primary Authorized Official, you can create, modify, and submit a Section 12(b) form. You can also delete Section 12(b) forms, create amendments, and download the Copy of Record (CoR).

For questions concerning the Toxic Substances Control Act (TSCA) Section 12(b) software requirements, please contact the Central Data Exchange (CDX) Help Desk at helpdesk@epacdx.net or call 1-888-890-1995 between the hours of 8 am – 6 pm Eastern Standard Time (EST).

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. The statements in this document are intended solely as guidance to aid in complying with EPA regulation.



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1 System Requirements

To use the Section 12(b) Export Notification application to submit a Section 12(b) form, the following are required:

- An e-mail account
- JavaScript enabled web browser
- Internet access
- Adobe Acrobat Reader 5.0 or higher
- CDX username and password

1.1 Supported Browsers

One of the following supported browsers is required to access the Section 12(b) application:

- Vendor supported versions of Internet Explorer (IE) or Edge

Go to the following link to download:

<https://support.microsoft.com/en-us/help/17621/internet-explorer-downloads>

- Vendor supported versions of Mozilla Firefox

Go to the following link to download:

<https://www.mozilla.org/en-US/firefox/new/>

- Vendor supported versions of Safari

Go to the following link to download:

<https://support.apple.com/downloads/>

- Vendor supported versions of Google Chrome

Go to the following link to download:

<http://www.google.com/chrome>

1.2 Screen Resolution

Screen resolution should be set to 1024 x 768 or greater.

2 Primary Authorized Official (AO) Functions

This section describes how to:

- Access the application
- Navigate the Section 12(b) Export Notification ‘Home’ screen
- Assign Supports to complete a form
- Start, complete, and submit a Section 12(b) Export Notification form
- Upload an extensible markup language (XML) file
- Download a Copy of Record
- Create an amendment

The Primary AO is responsible for the submission of main forms. As a Primary AO, you can create a new form. You are also responsible for submitting amendments, unlocking submissions, and deleting forms. You can assign Supports (or other authorized individuals) to edit and complete a form on your behalf. The Primary AO can be thought of as a primary company authorized official, specifically in regards to any sponsored individuals.

You can save the form at any point during the data entry process. The save functionality allows you to return to that same form at any point in the future. You can print the form at any point; however, the ‘Not for Submission’ watermark will be placed on the form anytime the form is printed prior to actual submission.

Exhibit 3-1 displays a table of the user role capabilities within the Section 12(b) application:

Exhibit 3-1 Section 12(b) User Roles Matrix

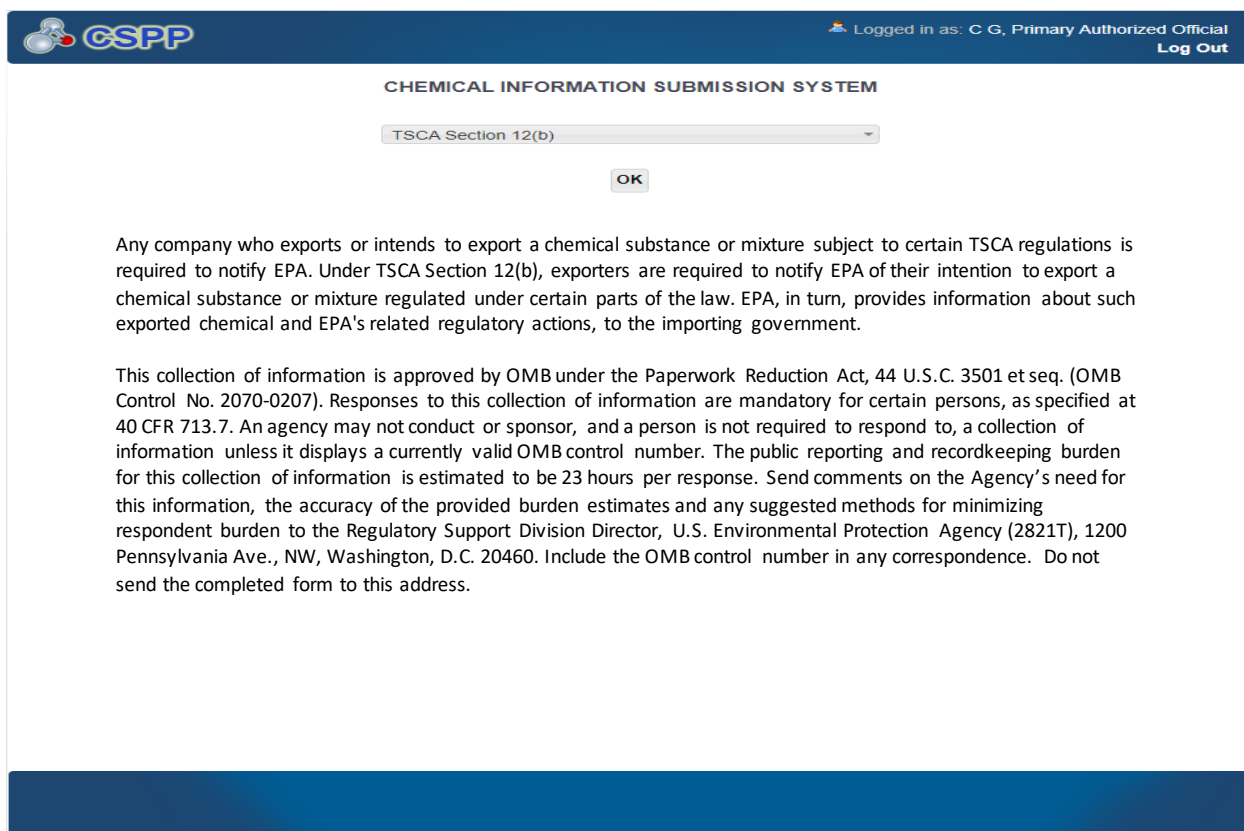
Legend	Primary Authorized Official		Primary Support	
	(Primary Company Authorized Official)			
	US	non-US	US	non-US
Export Notifications				
Create all <u>original</u> main forms	X	X		
Submit <u>original</u> main forms	X			
Submit <u>original</u> ACM forms	X	X		
Submit amendments (by editing the main forms)	X	X		
Unlock all main forms	X	X		
Edit unlocked main forms	X	X	X	X
Delete forms	X	X		
Assign Supports	X	X		

2.1 Log into Section 12(b) Application

After you create an account in CDX, click the ‘Primary Authorized Official’ link for the Chemical Safety and Pesticide Programs (CSPP) data flow to navigate to the ‘Chemical Information Submission System’ screen.

Exhibit 3-2 shows a screen capture of the ‘Chemical Information Submission System’ screen:

Exhibit 3-2 Chemical Information Submission System Screen



CHEMICAL INFORMATION SUBMISSION SYSTEM

TSCA Section 12(b)

OK

Any company who exports or intends to export a chemical substance or mixture subject to certain TSCA regulations is required to notify EPA. Under TSCA Section 12(b), exporters are required to notify EPA of their intention to export a chemical substance or mixture regulated under certain parts of the law. EPA, in turn, provides information about such exported chemical and EPA's related regulatory actions, to the importing government.

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Navigation: To access the Section 12(b) ‘Home’ screen, select ‘TSCA Section 12(b)’ from the submission type drop-down menu and click the ‘OK’ button.

2.2 Section 12(b) Home Screen Navigation

You can access the Section 12(b) ‘Home’ screen by selecting ‘TSCA Section 12(b)’ from the submission type drop-down menu on the ‘Chemical Information Submission System’ screen and clicking the ‘OK’ button.

The Section 12(b) ‘Home’ screen is the first screen within the Section 12(b) application. It displays the ‘Quick Tasks,’ ‘Useful Resources,’ and ‘Submission History’ panels. There is also a ‘Help’ drop-down menu within the application header, which provides a link to the user guide.

There is a ten (10) minute logout timer for this application; the application will automatically log you out after ten minutes of inactivity and navigate you back to the CDX login screen.

- **Quick Tasks:** Click the ‘Start Export Notification’ button to create an online export notification, or click the ‘Upload CSV File’ button to upload information in bulk.
- **Useful Resources:** Click the links within the ‘Useful Resources’ section.
- **Submission History:** Modify or delete a Section 12(b) form using the ‘Submission History’ section. For additional details about the ‘Submission History’ panel, please refer to **Section 3.3**.

Exhibit 3-3 shows a screen capture of the Section 12(b) ‘Home’ screen:

Exhibit 3-3 Section 12(b) Home Screen


2.3 Submission History

Only one Section 12(b) form is created per form alias, which helps differentiate between forms. Each column within the table of the ‘Submission History’ screen can be sorted by clicking the individual column headers.

Start New Form: To create a new Section 12(b) Export Notification form, click the ‘Start Export Notification’ button. You are required to create a passphrase that will be associated with that particular form. Make sure to create a passphrase that you will remember, as it cannot be retrieved or reset. Refer to **Section 3.4** for further instructions on creating a passphrase.

Edit an ‘In Progress’ Form: To modify an existing Section 12(b) Export Notification, click the ‘Form Alias’ link for a form with a status of ‘In Progress.’ You are required to enter the passphrase associated with that particular form to access and edit the form. It is possible for more

than one user to modify a form simultaneously; the user that clicks the 'Save' button first will have his/her changes saved.

Amend a 'Submitted' Form: To edit an already submitted Section 12(b) form (i.e., to create an amendment), you must first unlock the particular submission by clicking the 'Lock' icon () under the 'Action' column. You will be required to enter the passphrase associated with that particular submission to gain access and continue amending the submission. All further changes that are made will be submitted as an amendment. Refer to **Section 9** for further instructions on creating an amendment.

The 'Submission History' section displays the following fields and columns of information:



- **# Entries Found:** Displays the number of entries found under this user account for Section 12(b).
- **Submission Alias:** Displays the form alias of a Section 12(b) form. Click the form alias link to navigate to the 'Enter Passphrase' page and complete/edit a form.
- **Modification Date:** Displays the date that a form was last modified.
- **Submission Date:** Displays the date that a form was successfully submitted to EPA via CDX. This date populates only after the form has been submitted.
- **Status:** Displays the status of a Section 12(b) form (either 'In Progress,' 'Submitted,' or 'Completed').
- **Actions:** Click the 'Delete' icon () to delete an in-progress form. Click the 'Lock' icon () to unlock a form for an amendment. The form remains unlocked until the form is resubmitted by the AO.
- **Export Options:** Click the 'XML,' 'CSV,' 'PDF,' or 'Excel' button to download the 'Submission History' table as an .xml, .csv, .pdf, or .xlsx file, respectively.

Exhibit 3-4 shows a screen capture of the Section 12(b) ‘Submission History’ section:

Exhibit 3-4 Section 12(b) Submission History Section

Navigation: Click the ‘Start Export Notification’ button to create a new Section 12(b) form and navigate to the ‘Create Passphrase’ screen.

2.4 Create Passphrase

To start a new Section 12(b) form, click the ‘Start Export Notification’ button on the Section 12(b) ‘Home’ screen to navigate to the ‘Create Passphrase’ screen, which allows you to create a passphrase and associate that passphrase with your newly created form.

The application uses the passphrase as an encryption key to protect the contents of the form. You are responsible for remembering the passphrase and distributing it to the appropriate individuals.

If you lose or forget your passphrase, you will not be able to access your Section 12(b) form to print, submit, or make changes. You will need to complete a new Section 12(b) form and create a new passphrase. For security reasons, the system administrator will not have access to your passphrase and will not be able to retrieve it or reset it.

- **New Passphrase:** Enter a passphrase that is between 8 to 20 characters. For maximum security, your passphrase should contain a combination of letters and numbers. Your

passphrase should not contain special characters (for example, +, ?, and *). As a Primary user, you are responsible for remembering your passphrase and distributing it to only authorized individuals. The passphrase is used as an encryption key to protect the contents of the form data.

- **Confirm Passphrase:** Enter the same passphrase that was entered into the ‘New Passphrase’ field. The same passphrase may be associated with multiple forms. The user can choose to have the same passphrase for all forms. Supports do not have the ability to start a new form or create a passphrase for a form.

Exhibit 3-5 shows a screen capture of the ‘Create Passphrase’ screen:

Exhibit 3-5 Create Passphrase Screen

Navigation: Create a passphrase and click the ‘Continue’ button to navigate to the ‘Exporter Information’ screen in a Section 12(b) Export Notification form.

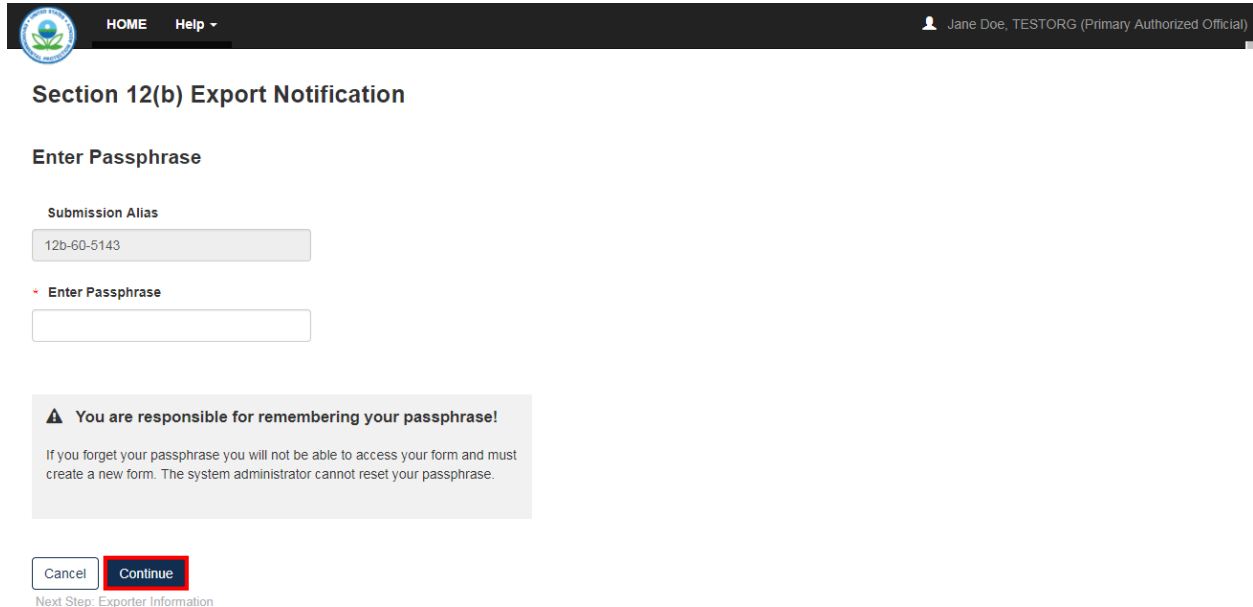
2.5 Enter Passphrase

To edit a form, click the ‘Form Alias’ link for a Section 12(b) form with a status of ‘In Progress.’ The ‘Enter Passphrase’ screen requires you to enter the passphrase that is associated with the form.

- **Submission Alias:** Displays the form alias that is used to identify the form.
- **Enter Passphrase:** Enter the passphrase that is associated with the form.

Exhibit 3-6 shows a screen capture of the ‘Enter Passphrase’ screen:

Exhibit 3-6 Enter Passphrase Screen



Navigation: Enter the passphrase originally created and associated with the form and click the ‘Continue’ button to navigate to the ‘Exporter Information’ screen.

2.6 Action Bar

The action bar is located at the top and bottom of the form on each screen. You can perform the following functions using the top action bar:

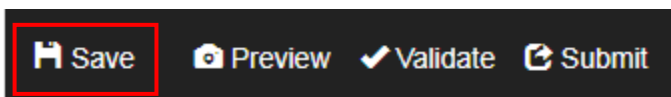
- **Home:** Click the ‘Home’ link to navigate to the Section 12(b) ‘Home’ screen.
- **Help:** Click the ‘Help’ link to generate a drop-down menu, which displays a link to the user guide.
- **User ID:** Click the user ID link to log out of the application.

The following exhibits, Exhibit 3-7, Exhibit 3-8, Exhibit 3-9, and Exhibit 3-10, show screen captures for the bottom action bar:

- **Save:** Click the ‘Save’ link at any stage of completing a Section 12(b) form to save the form. To generate and access links to other pages of the form within the navigation tree, you must click the ‘Save’ link within the action bar. After you click the ‘Save’ link, you will receive a

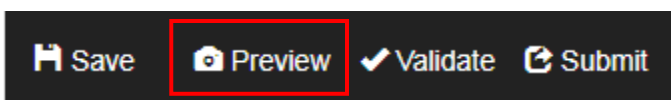
message indicating that all data entered in the form has been saved successfully. The save function does not validate any entered data. Click the ‘Previous’ and ‘Next’ buttons on a form to save the data entered within a form. Click the ‘X’ button in the upper right-hand corner of the form in your browser to close the form without saving.

Exhibit 3-7 Action Bar – Save



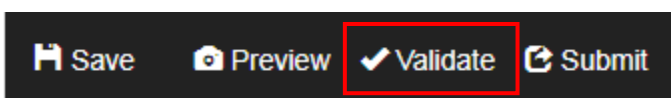
- **Preview:** Click the ‘Preview’ link after uploading a minimum of one chemical to preview the form. After you click the ‘Preview’ link, you will be given the option to view a regular version of the PDF(s) or a sanitized version of the PDF(s). Choosing either option will download (a) watermarked PDF version(s) of each chemical identified within the form in a .zip file.

Exhibit 3-8 Action Bar – Preview



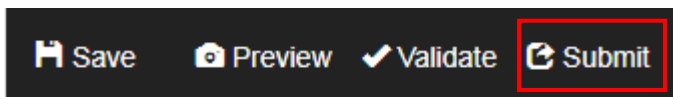
- **Validate:** Click the ‘Validate’ link at any stage of completing a Section 12(b) Notice of Activity form. A ‘TSCA Section 12(b) Validation’ window generates when you click the ‘Validate’ link if you disable the pop-up blocker within your internet browser. The ‘Section 12(b) Validation’ pop-up window displays a report of all warning messages. Refer to **Section 6** for more information on validating a form.

Exhibit 3-9 Action Bar – Validate



- **Submit:** Click the ‘Submit’ link to submit a Section 12(b) form after completing all sections of a Section 12(b) form. After you click the ‘Submit’ link a pop-up message displays to confirm the submission process. The form validates during the submission process and displays any applicable warning or error messages. Refer to **Section 6** for further instructions on validation errors. You can continue with the submission process only after clearing all validation errors. Upon successful submission of the form, the application generates and sends an email indicating the successful submission of the form to the submitter’s email address. Refer to **Section 7** for more information on submitting a Section 12(b) Export Notification form.

Exhibit 3-10 Action Bar – Submit



- **CDX Links:** Click any of the ‘CDX Links,’ located at the bottom of each screen within the ‘CDX Links’ drop-down menu, at any stage of completing a Section 12(b) form.
 - Click the ‘CDX Homepage’ link to navigate to the ‘CDX’ homepage.
 - Click the ‘MyCDX Homepage’ link to navigate to the ‘MyCDX’ page.

- Click the 'EPA Homepage' link to navigate to the EPA Homepage.
- Click the 'Terms and Conditions' link to navigate to the CDX Terms and Conditions screen.
- Click the 'Privacy Notice' link to navigate to the CDX Privacy and Security Notice screen.

Exhibit 3-11 shows a screen capture of the action bar 'CDX Links':

Exhibit 3-11 CDX Links



2.7 Upload Chemical(s) Using .CSV File

The 'Upload CSV File' button displays on the Section 12(b) 'Home' screen within the 'Quick Tasks' panel. Upon clicking this button you will be asked to create a passphrase before navigating to the 'Exported Chemicals' screen within a newly created Section 12(b) Export Notification form. Refer to **Section 3.4** for further information on the passphrase creation process.

'Chemicals by Uploading a CSV File' will be automatically selected within the 'Add one or more' drop-down menu, thus displaying fields of information on uploading a .csv file. Refer to **Section 4.3.4** for further information on uploading a .csv file within a Section 12(b) form. You will still have to complete all other parts of the Export Notification, including the 'Exporter Information' screen, before being able to submit to EPA. Refer to **Section 4** through **Section 4.5** for the entire walkthrough of a Section 12(b) form.

3 Export Notification

Any company who exports or intends to export a chemical substance or mixture subject to certain TSCA regulations is required to notify EPA. Under TSCA Section 12(b), exporters are required to notify EPA of their intention to export a chemical substance or mixture regulated under certain parts of the law. EPA, in turn, provides information about such exported chemical and EPA's related regulatory actions, to the importing government.

3.1 Create an Online Export Notification

To create a new Export Notification form, navigate to the Section 12(b) 'Home' screen and click the 'Start Export Notification' button. Refer to **Section 3.2** for additional details regarding the Section 12(b) 'Home' screen.

Refer to **Section 3.4** for additional details regarding the passphrase creation process.

3.2 Exporter Information

You can navigate to the 'Exporter Information' screen by clicking the 'Start Export Notification' button and creating a new passphrase, or by accessing a Section 12(b) form that is 'In Progress' and entering the passphrase associated with the selected form.

This screen displays two sections – 'Submitter Information' and 'Exporter Information.' You will also have the option to assign a 'Submission Alias' to identify the form. A unique submission alias is helpful when a user or company has multiple forms and/or when you must differentiate between forms to the help desk. Upon navigating to the 'Exporter Information' screen, the system auto-generates a default alias comprised of a form type in the following format: <12b-XX-XXXX>. This is a required field.

3.2.1 Submitter Information

The 'Submitter Information' section of the 'Exporter Information' screen displays the organization or individual preparing the Section 12(b) submission. This information is pre-populated from CDX registration. If the information listed is incorrect please make the appropriate edits to your user information in CDX registration.

- **CBI:** Check this checkbox to claim the submitter information as CBI.
- **User Information:** Displays the name, email address, and phone number of the submitter.
- **Organization:** Displays the company's name, mailing address, city, state (if applicable), postal code, and country of the submitter.
- **Job Title (optional):** Enter the submitter's job title.

3.2.2 Exporter Information

The 'Exporter Information' section of the 'Exporter Information' screen provides fields to input identifying information for the manufacturing or processing establishment that is exporting chemicals or mixtures outside the United States.

- **Copy Organization Information from Above?:** Click this link to copy CDX registration information, as shown above within the 'Submitter Information' section.
- **Company Name:** Enter the company name of the exporter. This is a required field.
- **CBI:** Check this checkbox to claim the company name as CBI.

- **Address Line 1:** Enter line 1 of the address of the exporter. This is a required field.
- **CBI:** Check this checkbox to claim the entire address as CBI.
- **Address Line 2 (optional):** Enter line 2 of the address of the exporter, if applicable.
- **City:** Enter the city of the exporter. This is a required field.
- **State:** Enter the state of the exporter. This is a required field.
- **Postal Code:** Enter the postal code of the exporter. This is a required field.

Exhibit 4-1 shows a screen capture of the ‘Exporter Information’ screen (Scroll 1):

Exhibit 4-1 Exporter Information Screen (Scroll 1)

HOME Help ▾ Jane Doe, TESTORG (Primary Authorized Official)

Section 12(b) Export Notification

Step 1 Step 2 Step 3

Exporter Information Exported Chemicals Review & Submit

▾ Submission Alias

12b-60-5143

Please do not include CBI information in the Submission Alias field.

Submitter Information CBI

The organization or individual preparing this TSCA Section 12(b) submission. The information displayed below changes based on the signed-in user who accesses this submission.

User Information	Organization Information
Jane Doe	TESTORG
Jane.Doe@test.com	Address
(555) 555-5555	City, State 12345
	United States

Job Title (optional)

Exporter Information

The organization or individual exporting chemicals or mixtures outside the United States

Save Preview Validate Submit CDX Links ▾ CDX Helpdesk: (888) 890-1995

Exhibit 4-2 shows a screen capture of the ‘Exporter Information’ screen (Scroll 2):

Exhibit 4-2 Exporter Information Screen (Scroll 2)

Navigation: Click the ‘Continue’ button to navigate to the ‘Exported Chemicals’ screen. You can also access this screen by clicking the ‘Exported Chemicals’ link within the navigation header.

3.3 Exported Chemicals

You can navigate to the ‘Exported Chemicals’ screen by clicking the ‘Continue’ button from the ‘Exporter Information’ screen, or by clicking the ‘Exported Chemicals’ link within the navigation header.

This screen displays the ‘TSCA Section 12(b) Exported Chemicals Table’ and the ‘Add Exported Chemicals’ section.

The ‘Add Exported Chemicals’ section within the ‘Exported Chemicals’ screen displays a drop-down menu labeled ‘Add one or more.’ Select one of the following from this drop-down menu – ‘Countries to a Chemical,’ ‘Chemicals to a Country,’ or ‘Chemicals by Uploading a CSV File.’

3.3.1 Add Exported Chemicals – Countries to a Chemical

The following information is displayed when ‘Countries to a Chemical’ is selected from the ‘Add one or more’ drop-down menu:

- **Search SRS for 12(b) Chemicals or Create a New Chemical:** Click this link to generate the ‘Search Substance Registry Services (SRS)’ pop-up window. Refer to **Section 4.3.3** for further information on adding a chemical using SRS.

Upon adding a chemical using SRS, a new section will generate within the 'Exported Chemicals' screen, labeled 'Provide Chemical Details.' This section will be prepopulated with the identified chemical name and the following fields of information:

- **Chemical Name:** Displays the chemical name of the chemical substance selected within the 'Search Substance Registry Services (SRS)' pop-up window. This is a required field.
- **TSCA Section:** Select the TSCA section for the identified chemical substance (either Section 4, Section 5, Section 5(a)(2), Section 5(b), Section 5(e), Section 6, Section 7, Section 5(a)(2)(e), or Section 5(f)). This is a required field.
- **Section 12(b) Category:** Select the Section 12(b) category for the identified chemical substance. This is a required field. Refer to **Appendix A** for a list of categories that this drop-down menu provides.
- **Import Country:** Select the country from the drop-down menu to which the chemical(s) are imported. Check the 'CBI' checkbox next to this field to claim the import country as CBI. This is a required field.
- **Export Date or Intended Export Date:** Click the calendar widget to select the anticipated or set date for export. Check the 'CBI' checkbox next to this field to claim the export date as CBI. This is a required field.
- **Add Import Country and Export Date to Chemical:** Click this button to add the selected country and date to the chemical, which will then be populated into the 'List of Import Countries and Export Dates' panel.
- **Delete:** Click the 'Delete' icon (✖) to remove an import country and export date entry from the 'List of Import Countries and Export Dates' panel.
- **Add to Exported Chemicals Table:** Once all countries and export dates have been added to the 'List of Import Countries and Export Dates,' click this button to add this chemical substance to the 'TSCA Section 12(b) Exported Chemicals Table.'
- **Cancel:** Click this button to close the 'Provide Chemical Details' section and the 'List of Import Countries and Export Dates' without saving.

Exhibit 4-3 shows a screen capture of the ‘Exported Chemicals’ screen with ‘Countries to a Chemical’ selected (Scroll 1):

Exhibit 4-3 Exported Chemicals Screen – Countries to a Chemical (Scroll 1)

HOME Help ▾ Jane Doe, TESTORG (Primary Authorized Official)

Section 12(b) Export Notification

Step 1 Step 2 Step 3

Exporter Information **Exported Chemicals** Review & Submit

TSCA Section 12(b) Exported Chemicals Table

You have no exported chemical(s) so far.

Add Exported Chemicals

Add chemicals to the Section 12(b) Exporter Chemicals Table.

Add one or more Countries to a Chemical ▾

[Search SRS for 12\(b\) Chemicals or Create New Chemical](#)

Provide Chemical Details

Complete the fields below.

- Chemical Name**
Calcium cobalt lead strontium titanium tungsten oxide
- TSCA Section**
Please choose a TSCA Section ▾

List of Import Countries and Export Dates

Selected Chemical:
Calcium cobalt lead strontium titanium tungsten oxide (1262279-30-0)

Import Country: Hungary
Export Date: 01/01/2018

[Add to Exported Chemicals Table](#)

Save Preview Validate Submit CDX Links ▾ CDX Helpdesk: (888) 890-1995

Exhibit 4-4 shows a screen capture of the ‘Exported Chemicals’ screen with ‘Countries to a Chemical’ selected (Scroll 2):

Exhibit 4-4 Exported Chemicals Screen – Countries to a Chemical (Scroll 2)

3.3.2 Add Exported Chemicals – Chemicals to a Country

The following information is displayed when ‘Chemicals to a Country’ is selected from the ‘Add one or more’ drop-down menu:

- **Search SRS for 12(b) Chemicals or Create a New Chemical:** Click this link to generate the ‘Search Substance Registry Services (SRS)’ pop-up window. Refer to **Section 4.3.3** for further information on adding a chemical using SRS.

Upon adding a chemical using SRS, a new section will generate within the ‘Exported Chemicals’ screen, labeled ‘Provide Chemical Details.’ This section will be prepopulated with the identified chemical name and the following fields of information:

- **Import Country:** Select the country from the drop-down menu to which the chemical(s) are imported. Check the ‘CBI’ checkbox next to this field to claim the import country as CBI. This is a required field.
- **Export Date or Intended Export Date:** Click the calendar widget to select the anticipated or set date for export. Check the ‘CBI’ checkbox next to this field to claim the export date as CBI. This is a required field.
- **Chemical Name:** Displays the chemical name of the chemical substance selected within the ‘Search Substance Registry Services (SRS)’ pop-up window. This is a required field.

- **TSCA Section:** Select the TSCA section for the identified chemical substance (either Section 4, Section 5, Section 5(a)(2), Section 5(b), Section 5(e), Section 6, Section 7, Section 5(a)(2)(e), or Section 5(f)). This is a required field.
- **Section 12(b) Category:** Select the Section 12(b) category for the identified chemical substance. This is a required field. Refer to **Appendix A** for a list of categories that this drop-down menu provides.
- **Add Chemical to Import Country and Export Date:** Click this button to add the identified chemical to the selected date and country, which will then be populated into the ‘List of Exported Chemicals’ panel.
- **Delete:** Click the ‘Delete’ icon (✘) to remove an import country and export date entry from the ‘List of Exported Chemicals’ panel.
- **Add to Exported Chemicals Table:** Once all chemicals have been added to the ‘List of Exported Chemicals,’ click this button to add the chemical substance(s) to the ‘TSCA Section 12(b) Exported Chemicals Table.’
- **Cancel:** Click this button to close the ‘Provide Chemical Details’ section and the ‘List of Exported Chemicals’ without saving.

Exhibit 4-5 shows a screen capture of the ‘Exported Chemicals’ screen with ‘Chemicals to a Country’ selected (Scroll 1):

Exhibit 4-5 Exported Chemicals Screen – Chemicals to a Country (Scroll 1)

HOME Help ▾ Jane Doe, TESTORG (Primary Authorized Official)

Section 12(b) Export Notification

Step 1 Step 2 Step 3
 Exporter Information **Exported Chemicals** Review & Submit

TSCA Section 12(b) Exported Chemicals Table

You have no exported chemical(s) so far.

Add Exported Chemicals

Add chemicals to the Section 12(b) Exporter Chemicals Table.

Add one or more

* Import Country CBI

* Export Date or Intended Export Date CBI

List of Exported Chemicals

Import Country: Italy
 Export Date: 01/01/2018

✘ Chemical Name: Titanium salt, reaction products with silica (generic) (P-15-0252)

Save Preview Validate Submit CDX Links ▾ CDX Helpdesk: (888) 890-1995

Exhibit 4-6 shows a screen capture of the ‘Exported Chemicals’ screen with ‘Chemicals to a Country’ selected (Scroll 2):

Exhibit 4-6 Exported Chemicals Screen – Chemicals to a Country (Scroll 2)

The screenshot displays the 'Exported Chemicals' interface. At the top, there is a navigation bar with 'HOME', 'Help', and a user profile for 'Jane Doe, TESTORG (Primary Authorized Official)'. Below this, the 'Export Date or Intended Export Date' is set to '01/01/2018'. A search prompt reads 'Search SRS for 12(b) Chemicals or Create a New Chemical'. The 'Provide Chemical Details' section includes fields for 'Chemical Name', 'TSCA Section', and 'Section 12(b) Category'. A large blue button at the bottom of this section is labeled 'Add Chemical to Import Country and Export Date'. A pop-up window is overlaid on the right side, showing 'Import Country: Italy' and 'Export Date: 01/01/2018'. It contains a red error message: 'Chemical Name: Titanium salt, reaction products with silica (generic) (P-15-0252)'. Below the message are two buttons: 'Add to Exported Chemicals Table' and 'Cancel'. At the bottom of the page, there is a footer with 'Save', 'Preview', 'Validate', and 'Submit' buttons, along with 'CDX Links' and 'CDX Helpdesk: (888) 890-1995'.

3.3.3 Add Chemical using Substance Registry Services (SRS)

The ‘Search SRS for 12(b) Chemicals or Create New Chemical’ link displays on the ‘Exported Chemicals’ screen, when either ‘Countries to a Chemical’ or ‘Chemicals to a Country’ is selected from the ‘Add one or more’ drop-down menu under the ‘Add Exported Chemicals’ section.

Search SRS for 12(b) Chemicals or Create New Chemical: Click this button to generate the ‘Search Substance Registry Services (SRS)’ pop-up window. You can search for the reported chemical(s) by either the ‘Chemical Name/Synonym’ or the ‘Chemical Abstracts Service Registry Number (CASRN).’ You can also limit the search to certain categories of Section 12(b).

The system allows you to save each chemical by clicking the ‘Add Chemical to Submission’ button located at the bottom of the ‘Search Substance Registry Services (SRS)’ pop-up window. Once you select the specified chemical substance and click the ‘Add Chemical to Submission’ button, the chemical information populates into a generated section titled ‘Provide Chemical Details’ within the ‘Exported Chemicals’ screen.

- **Chemical Name/Synonym:** Select this radio button to search by the chemical name or synonym.

- **CASRN:** Select this radio button to search by the Chemical Abstracts Service Registry Number of the chemical; this field accommodates dashes.
- **Limit search to:** Select the appropriate category in this drop-down menu. Refer to **Appendix A** for a list of categories that this drop-down menu provides.
- **Search SRS:** Click the ‘Search SRS’ button to search SRS using the entered search criteria.
- **Add Chemical to Submission:** Click the ‘Add Chemical to Submission’ button to populate the chemical substance information into the ‘Exported Chemicals’ screen.
- **Close:** Click the ‘Close’ button to stop the process of adding chemical substance information and return to the ‘Exported Chemicals’ screen.
- **Create New Chemical:** Click the ‘Create New Chemical’ button to identify a new chemical. Refer to **Section 4.3.3.1** for further information on creating a new chemical.

Exhibit 4-7 shows a screen capture of the ‘Search Substance Registry Services (SRS)’ pop-up window:

Exhibit 4-7 Search Substance Registry Services (SRS) Pop-Up Window

Navigation: Click the ‘Add Chemical to Submission’ button to populate the selected chemical into a generated section titled ‘Provide Chemical Details’ within the ‘Exported Chemicals’ screen. Click the ‘Close’ button to close the window and return to the ‘Exported Chemicals’ screen.

3.3.3.1 Create New Chemical

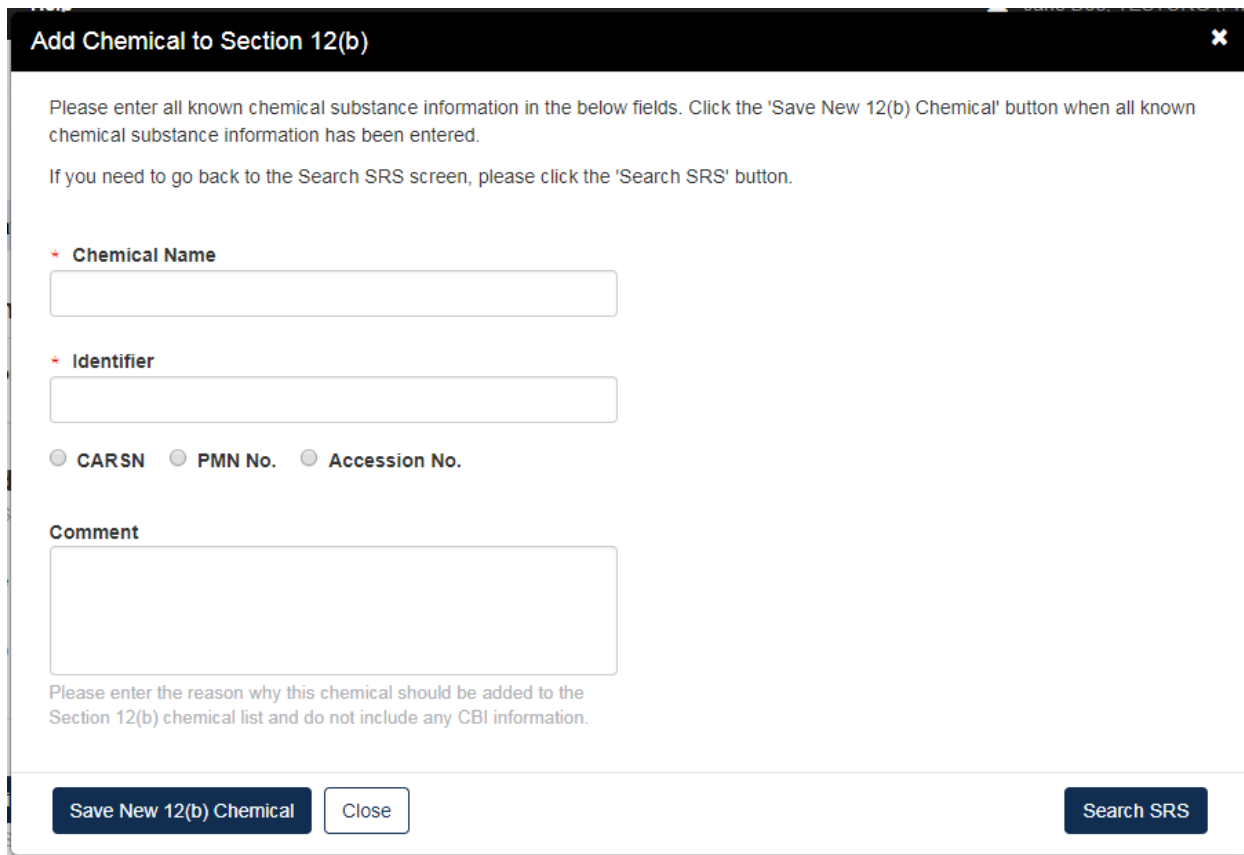
The ‘Create New Chemical’ button displays on the ‘Search Substance Registry Services (SRS)’ window to identify new chemicals.

- **Create New Chemical:** Click the ‘Create New Chemical’ button to generate the ‘Add Chemical to Section 12(b)’ window.

- **Chemical Name:** Enter the name of the identified chemical substance. This is a required field.
- **Identifier:** Enter the identifying number associated with the identified chemical substance. This is a required field.
- **CASRN:** Select this radio button if the identifier is a Chemical Abstracts Service Registry Number.
- **PMN No.:** Select this radio button if the identifier is a Premanufacture Notice number.
- **Accession No.:** Select this radio button if the identifier is an Accession number.
- **Save New 12(b) Chemical:** Click this button to populate the entered chemical information into the chemical fields within the 'Exported Chemicals' screen.
- **Close:** Click the 'Close' button to close the 'Add Chemical to Section 12(b)' window without saving the entered data.
- **Search SRS:** Click this button to navigate back to the 'Search Substance Registry Services (SRS)' window.

Exhibit 4-8 shows a screen capture of the 'Add Chemical to Section 12(b)' window:

Exhibit 4-8 Add Chemical to Section 12(b) Window



Add Chemical to Section 12(b)

Please enter all known chemical substance information in the below fields. Click the 'Save New 12(b) Chemical' button when all known chemical substance information has been entered.

If you need to go back to the Search SRS screen, please click the 'Search SRS' button.

* **Chemical Name**

* **Identifier**

CASRN PMN No. Accession No.

Comment

Please enter the reason why this chemical should be added to the Section 12(b) chemical list and do not include any CBI information.

Save New 12(b) Chemical **Search SRS**

3.3.4 Add Exported Chemicals – Chemicals by Uploading a CSV File

The following information is displayed when ‘Chemicals by Uploading a CSV File’ is selected from the ‘Add one or more’ drop-down menu:

- **↓ example:** Click this link to download an example of how the .csv file should be arranged.
- **The .csv file has a header in row 1.:** Check this checkbox if the uploaded .csv file has a header in the first row.
- **Browse....:** Click this button to search for and select a .csv file to upload.

Exhibit 4-9 shows a screen capture of the ‘Exported Chemicals’ screen with ‘Chemicals by Uploading a CSV File’ selected:

Exhibit 4-9 Exported Chemicals Screen – Chemicals by Uploading a CSV File

3.3.5 TSCA Section 12(b) Exported Chemicals Table

The ‘TSCA Section 12(b) Exported Chemicals Table’ within the ‘Exported Chemicals’ screen displays the following columns of information:

- **Chemical Name:** Displays the name of the identified chemical.
- **Identifier:** Displays the identifying number of the identified chemical.

- **TSCA Section:** Displays the TSCA Section of the identified chemical.
- **Category:** Displays the Section 12(b) category for the identified chemical.
- **Import Country:** Displays the import country for the identified chemical.
- **Export Date:** Displays the export date for the identified chemical.
- **Action:** Click the 'Delete' icon (✖) to remove the identified chemical from the chemicals table.

Exhibit 4-10 shows a screen capture of the 'Exported Chemicals' screen with chemicals populated within the 'TSCA Section 12(b) Exported Chemicals Table' (Scroll 1):

Exhibit 4-10 Exported Chemicals Screen (Populated) (Scroll 1)

HOME Help ▾
Jane Doe, TESTORG (Primary Authorized Official)

Section 12(b) Export Notification

Step 1
Step 2
Step 3

Exporter Information
Exported Chemicals
Review & Submit

TSCA Section 12(b) Exported Chemicals Table

Chemical Name	Identifier	TSCA Section	Category	Import Country	Export Date	Action
Titanium salt, reaction produc...		Section 4	Perfluoroalkyl Sulfonates (PFAS) ...	Hungary	01/01/2018	✖
Aluminum calcium oxide salt (g...		Section 5	Substances contaminated with Halogen...	Germany	01/01/2019	✖
Aluminum calcium oxide salt (g...		Section 5	Substances contaminated with Halogen...	Portugal	01/01/2021	✖
Modified phenol formaldehyde r...		Section 7	Hexavalent Chromium Water Treatment ...	Chile	10/01/2017	✖
Substituted phenols and formal...		Section 6	Nitrites of Alkali Metals (Group IA ...	Chile	10/01/2017	✖

Add Exported Chemicals

Add chemicals to the Section 12(b) Exporter Chemicals Table.

Add one or more Chemicals to a Country ▾

Save Preview Validate Submit
CDX Links ▾ | CDX Helpdesk: (888) 890-1995

Exhibit 4-11 shows a screen capture of the ‘Exported Chemicals’ screen with chemicals populated within the ‘TSCA Section 12(b) Exported Chemicals Table’ (Scroll 2):

Exhibit 4-11 Exported Chemicals Screen (Populated)(Scroll 2)

The screenshot shows the CDX interface for managing exported chemicals. At the top, there is a navigation bar with 'HOME', 'Help', and a user profile for 'Jane Doe, TESTORG (Primary Authorized Official)'. Below this is a table of chemicals:

Chemical Name	Section	Chemical Description	Country	Export Date	Status
Modified phenol formaldehyde r...	Section 7	Hexavalent Chromium Water Treatment ...	Chile	10/01/2017	✘
Substituted phenols and formal...	Section 6	Nitrites of Alkali Metals (Group IA ...)	Chile	10/01/2017	✘

Below the table is a section titled 'Add Exported Chemicals' with the instruction 'Add chemicals to the Section 12(b) Exporter Chemicals Table.' It includes a dropdown menu for 'Chemicals to a Country', a field for 'Import Country' (with a 'Please choose a Country ...' dropdown and a 'CBI' checkbox), and a field for 'Export Date or Intended Export Date' (with a calendar icon and a 'CBI' checkbox). At the bottom of this section are 'Previous' and 'Continue' buttons, with a note 'Next Step: Review & Submit'. A footer bar contains 'Save', 'Preview', 'Validate', 'Submit', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

Navigation: If any CBI claims were made, click the ‘Continue’ button to navigate to the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen. If no CBI claims were made, click the ‘Continue’ button to navigate to the ‘Review Submission Information’ screen.

3.4 Instructions for Substantiating Confidential Business Information (CBI) Claims

EPA modified the electronic reporting applications for TSCA submissions to accept CBI substantiations for CBI claims made during the creation of electronic submissions. Other than information exempt from substantiation under TSCA Section 14(c)(2), users who wish to assert CBI claims for data within a submission must substantiate those claims at the time of submission as required by TSCA Section 14(c)(3).

You can access the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen by claiming information as CBI within a form and clicking the ‘Instructions for Substantiating CBI Claims’ link within the navigation header. The link and screen will not generate until a CBI claim is made within a submission. Information claimed CBI must either be substantiated or claimed exempt pursuant to TSCA Section 14(c)(2) at the time of submission.

To substantiate a CBI claim, upload documentation asserting your claim(s) on the ‘Instructions for Substantiating CBI Claims’ screen within the form. You may also opt-out of substantiation on the ‘Instructions for Substantiating CBI Claims’ screen if, for example, you believe your CBI

claim is exempt under TSCA Section 14(c)(2). Common exemption reasons can be found at <https://www.epa.gov/tasca-cbi/what-information-include-cbi-substantiations>. To opt-out of substantiation at the time of submission, all CBI claims within a submission must be exempt.

- **Substantiation Opt-Out:** Certain data claimed CBI may be exempt from substantiation at the time of submission. If all information contained within the submission was previously substantiated or you believe it to be exempt pursuant to TSCA Section 14(c)(2), check the 'Substantiation Opt-Out' checkbox to generate the 'Substantiation Opt-Out Reason' text box and hide the 'File Upload' button. If a substantiation document is uploaded, checking the 'Substantiation Opt-Out' checkbox clears the uploaded attachments. Either a substantiation opt-out reason or CBI substantiation document must be provided if a CBI claim is made in a submission.
- **Substantiation Opt-Out Reason:** Enter information explaining why you believe your CBI claim(s) to be exempt from substantiation. Either a substantiation opt-out reason within the text box or CBI substantiation document must be provided if a CBI claim is made in a submission.
- **File Upload:** Click the 'File Upload' button to search your local machine and upload a file that contains your CBI substantiation. To overwrite an uploaded file, click the 'File Upload' button again to search for and upload a new file. If the 'Substantiation Opt-Out' checkbox is checked after you upload a file, the application will delete the uploaded file. Either a substantiation opt-out reason or CBI substantiation document must be provided if a CBI claim is made in a submission.
- **Check if the Substantiation Document is CBI:** If the uploaded substantiation document contains CBI, check the 'Check if the Substantiation Document is CBI' checkbox to generate the 'Sanitized Upload' button. A sanitized CBI substantiation document must be provided if the original substantiation document is claimed CBI.
- **Sanitized Upload:** Click the 'Sanitized Upload' button to search your local machine and upload a file that contains your sanitized CBI substantiation. To overwrite an uploaded file, click the 'Sanitized Upload' button again to search for and upload a new file. If the 'Substantiation Opt-Out' checkbox is checked after you upload a file, the application will delete the uploaded sanitized file. A substantiation attachment must be provided if the original substantiation document is claimed CBI.

If you are unfamiliar with substantiating CBI claims or require assistance preparing substantiation documents, EPA offers a link to templates and other information for substantiating CBI claims on the 'Instructions for Substantiating Confidential Business Information (CBI) Claims' screen. It is suggested that you right-click the link and open in a new tab or new window so you do not leave your submission as this may affect your saved data.

The following exhibits, Exhibit 4-12, Exhibit 4-13, Exhibit 4-14, and Exhibit 4-15, show screen captures of the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen:

Exhibit 4-12 Instructions for Substantiating CBI Claims Screen (Scroll 1)

HOME Help ▾
Jane Doe, TESTORG (Primary Authorized Official)

Section 12(b) Export Notification

Step 1
Step 2
Step 3
Step 4

Exporter Information

Exported Chemicals

CBI Substantiation

Review & Submit

Instructions for Substantiating Confidential Business Information (CBI) Claims

The Frank R. Lautenberg Chemical Safety for the 21st Century Act created a number of new requirements for those making confidential business information (CBI) claims in TSCA submissions. Among these requirements is an obligation to substantiate most CBI claims at the time of submission.

Information which may be claimed as CBI without substantiation is identified at TSCA 14(c)(2). This information includes:

- A. Specific information describing the processes used in manufacture or processing of a chemical substance, mixture, or article;
- B. Marketing and sales information;
- C. Information identifying a supplier or customer;
- D. In the case of a mixture, details of the full composition of the mixture and the respective percentages of constituents;
- E. Specific information regarding the use, function, or application of a chemical substance or mixture in a process, mixture, or article;
- F. Specific production or import volumes of the manufacturer or processor; and
- G. Prior to the date on which a chemical substance is first offered for commercial distribution, the specific chemical identity of the chemical substance, including the chemical name, molecular formula, Chemical Abstracts Service number, and other information that would identify the specific chemical substance, if the specific chemical identity was claimed as confidential at the time it was submitted in a notice under TSCA 5.

For other submissions where the submitter has claimed information as CBI, the submitter will be required to upload a document substantiating those CBI claims at the time of submission. The substantiation document should provide EPA any information believed to support the validity of the CBI claims. In order to assist submitters in substantiating their CBI claims, EPA has developed substantiation templates that may be used as a starting point in preparing their CBI substantiations. Submitters are encouraged to use these substantiation template documents, but are not required to do so. The templates and other information relating to substantiating CBI claims can be found at <https://www.epa.gov/tsca-cbi/what-information->

Save Preview Validate Submit

CDX Links ▾ CDX Helpdesk: (888) 890-1995

Exhibit 4-13 Instructions for Substantiating CBI Claims Screen (Scroll 2)



HOME Help ▾

Jane Doe, TESTORG (Primary Authorized Official)

Document substantiating those CBI claims at the time of submission. The substantiation document should provide EPA any information believed to support the validity of the CBI claims. In order to assist submitters in substantiating their CBI claims, EPA has developed substantiation templates that may be used as a starting point in preparing their CBI substantiations. Submitters are encouraged to use these substantiation template documents, but are not required to do so. The templates and other information relating to substantiating CBI claims can be found at <https://www.epa.gov/tsca-cbi/what-information-include-cbi-substantiations>.

The Agency is required to review and make a determination on the validity of many CBI claims. Failure to substantiate a CBI claim or a substantiation that does not adequately justify the claim may result in a denial of claims and subsequent public release of information. If you have any questions concerning the options or the substantiation process, please contact:

- Scott Sherlock, 202-564-8257, sherlock.scott@epa.gov
- Jessica Barkas, 202-250-8880, barkas.jessica@epa.gov

If you believe all of the information you have claimed as CBI is exempt from substantiation under TSCA section 14(c)(2) or has been previously substantiated, select the following "Substantiation Opt Out" checkbox and provide a detailed explanation why you believe substantiation is not required.

Substantiation Opt-Out

[+ Attach CBI Substantiation Document](#)

Previous

Continue

Next Step: Review & Submit

Save Preview Validate Submit

CDX Links ▾ CDX Helpdesk: (888) 890-1995

Exhibit 4-14 Instructions for Substantiating CBI Claims Screen (Scroll 3)



HOME Help ▾

Jane Doe, TESTORG (Primary Authorized Official)

Submitters are encouraged to use these substantiation template documents, but are not required to do so. The templates and other information relating to substantiating CBI claims can be found at <https://www.epa.gov/tsca-cbi/what-information-include-cbi-substantiations>.

The Agency is required to review and make a determination on the validity of many CBI claims. Failure to substantiate a CBI claim or a substantiation that does not adequately justify the claim may result in a denial of claims and subsequent public release of information. If you have any questions concerning the options or the substantiation process, please contact:

- Scott Sherlock, 202-564-8257, sherlock.scott@epa.gov
- Jessica Barkas, 202-250-8880, barkas.jessica@epa.gov

If you believe all of the information you have claimed as CBI is exempt from substantiation under TSCA section 14(c)(2) or has been previously substantiated, select the following "Substantiation Opt Out" checkbox and provide a detailed explanation why you believe substantiation is not required.

Substantiation Opt-Out

Uploaded File Name: Penguins.jpg

CBI: Y

Action: [Edit](#) | [Delete](#)

Previous

Continue

Next Step: Review & Submit

Save Preview Validate Submit

CDX Links ▾ CDX Helpdesk: (888) 890-1995

Exhibit 4-15 Instructions for Substantiating CBI Claims Screen (Scroll 4)

HOME Help ▾
Jane Doe, TESTORG (Primary Authorized Official)

present substantiating those CBI claims at the time of submission. The substantiation document should provide EPA any information believed to support the validity of the CBI claims. In order to assist submitters in substantiating their CBI claims, EPA has developed substantiation templates that may be used as a starting point in preparing their CBI substantiations. Submitters are encouraged to use these substantiation template documents, but are not required to do so. The templates and other information relating to substantiating CBI claims can be found at <https://www.epa.gov/tsca-cbi/what-information-include-cbi-substantiations> .

The Agency is required to review and make a determination on the validity of many CBI claims. Failure to substantiate a CBI claim or a substantiation that does not adequately justify the claim may result in a denial of claims and subsequent public release of information. If you have any questions concerning the options or the substantiation process, please contact:

- Scott Sherlock, 202-564-8257, sherlock.scott@epa.gov
- Jessica Barkas, 202-250-8880, barkas.jessica@epa.gov

If you believe all of the information you have claimed as CBI is exempt from substantiation under TSCA section 14(c)(2) or has been previously substantiated, select the following "Substantiation Opt Out" checkbox and provide a detailed explanation why you believe substantiation is not required.

Substantiation Opt-Out

* **Substantiation Opt-Out Reason**

Previous
Continue

Next Step: Review & Submit

Save Preview Validate Submit
CDX Links ▾ CDX Helpdesk: (888) 890-1995

Navigation: Click the ‘Continue’ button to navigate to the ‘Review Submission Information’ screen. You can also access this screen by clicking the ‘Review & Submit’ link within the navigation header.

3.5 Review Submission Information

You can navigate to the ‘Review Submission Information’ screen by clicking the ‘Continue’ button from either the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen if any CBI claims were made, or the ‘Exported Chemicals’ screen if no CBI claims were made. You can also access this screen by clicking the ‘Review & Submit’ link within the navigation header.

This screen displays a summary of information that was entered throughout this form, including ‘Submitter Information,’ ‘Exporter Information,’ and a ‘List of Exported Chemicals.’

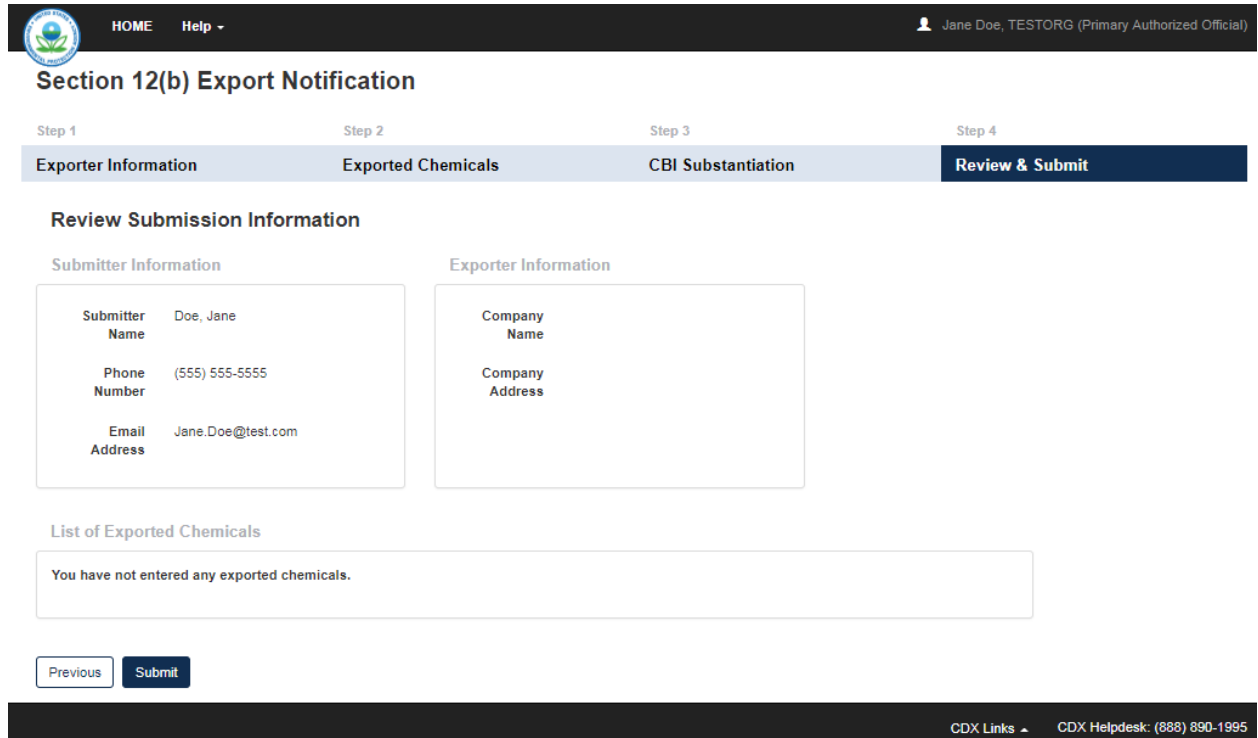
The following information is displayed within the ‘Review Submission Information’ screen:

- **Submitter Name:** Displays the name of the submitter.
- **Phone Number:** Displays the phone number of the submitter.
- **Email Address:** Displays the email address of the submitter.
- **Company Name:** Displays the company name of the exporter.
- **Company Address:** Displays the company address of the exporter.

- **List of Exported Chemicals:** Displays a duplicate of the ‘TSCA Section 12(b) Exported Chemicals Table,’ as shown within the ‘Exported Chemicals’ screen.

Exhibit 4-16 shows a screen capture of the ‘Review Submission Information’ screen:

Exhibit 4-16 Review Submission Information Screen



HOME Help - Jane Doe, TESTORG (Primary Authorized Official)

Section 12(b) Export Notification

Step 1 Step 2 Step 3 Step 4

Exporter Information Exported Chemicals CBI Substantiation **Review & Submit**

Review Submission Information

Submitter Information

Submitter Name Doe, Jane

Phone Number (555) 555-5555

Email Address Jane.Doe@test.com

Exporter Information

Company Name

Company Address

List of Exported Chemicals

You have not entered any exported chemicals.

Previous Submit

CDX Links CDX Helpdesk: (888) 890-1995

Navigation: Click the ‘Submit’ button to begin the submission process. Refer to **Section 7** for further information on the submission process.

4 Preview

The system provides the option to preview a form during the submission process. Click the 'Preview' link, located within the bottom action bar, to preview a PDF file of the regular or sanitized version of the form. After you choose either the 'Regular' or 'Sanitized' PDF, the application generates a watermarked PDF draft of the form.

The watermark reads 'Not For Submission' and displays across each page in the background. The form preview displays the entire form in a printable format. The preview functionality provides the flexibility to track the status of the form and see the entire form in a single viewpoint.

Exhibit 5-1 shows a screen capture for the 'Preview Section 12(b) Export Notification PDF' form:

Exhibit 5-1 Preview Section 12(b) Export Notification PDF

TSCA Section 12(b) Export Notification			
Submission Alias:			
Submitter Information			CBI <input type="checkbox"/>
First Name			
Last Name			
Phone Number			
Email Address			
Job Title			
Organization Name			
Address Line 1			
Address Line 2			
City	State	Postal Code	Country
Exporter Information			
Company Name			CBI <input type="checkbox"/>
Address Line 1			CBI <input type="checkbox"/>
Address Line 2			
City	State	Postal Code	Country
Exported Chemicals			

5 Validate

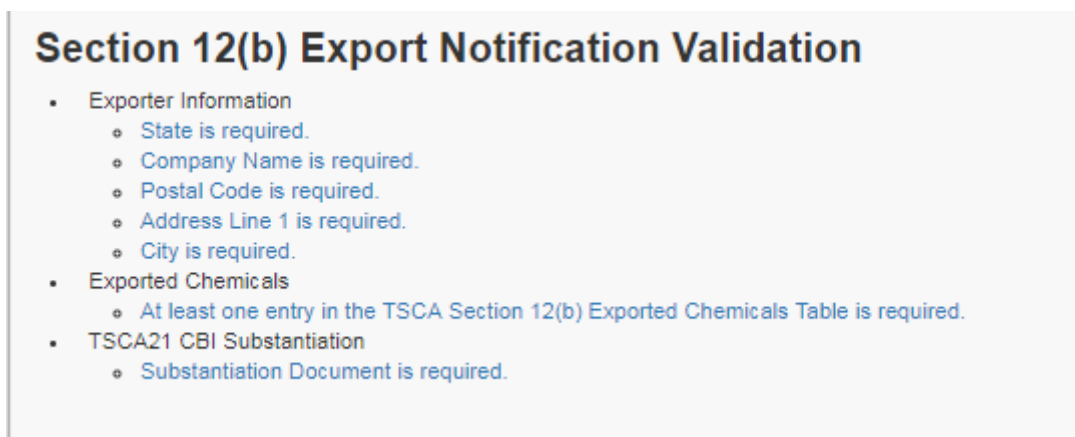
You can click the ‘Validate’ link located within the bottom action bar at any stage of completing a Section 12(b) form. The ‘Section 12(b) Export Notification Validation’ window displays when you click the ‘Validate’ link. Disable the pop-up blocker within your internet browser so that the ‘Section 12(b) Export Notification Validation’ window displays correctly. This validation window displays a report of all validation errors. During the validation process, the application validates each screen of the form to find missing and invalid data.

Validation Errors: Errors can be fixed by clicking the error link. The links will display the *Screen Title Name* (e.g., Exporter Information) and the associated error. After you click a link, the main application screen will display the section where the error occurred so you can easily fix the error. Once you have fixed the error(s), click the ‘Validate’ link again to refresh the ‘Section 12(b) Export Notification Validation’ window. If the information you fixed passes validation, the error will be removed from the validation window. You must fix all validation errors to submit the form to CDX successfully.

Click the ‘X’ button located at the upper right-hand corner of the window to close the ‘Section 12(b) Export Notification Validation’ window.

Exhibit 6-1 shows a screen capture of the ‘Section 12(b) Export Notification Validation’ window:

Exhibit 6-1 Section 12(b) Export Notification Validation Window



6 Submit to EPA via CDX

As a Primary AO, you have the ability to sign and submit a Section 12(b) Export Notification form to EPA via CDX. You can save your form at any point during the data entry process. Any assigned Supports for your form cannot submit the Section 12(b) form. The save functionality will allow you to return to that same form at any point in the future.

Once you complete all required information and correct all items failing validation, the system will allow the form to be successfully submitted.

6.1 TSCA Certification

Click the ‘Submit’ button from the ‘Review Submission Information’ screen to access the ‘TSCA Certification’ screen.

Exhibit 7-1 shows a screen capture of the ‘TSCA Certification’ screen:

Exhibit 7-1 TSCA Certification Screen

The screenshot displays the 'Section 12(b) Export Notification' interface. At the top, there is a navigation bar with 'HOME' and 'Help' links, and a user profile for 'Jane Doe, TESTORG (Primary Authorized Official)'. Below this, a progress indicator shows four steps: 'Step 1: Exporter Information', 'Step 2: Exported Chemicals', 'Step 3: CBI Substantiation', and 'Step 4: Review & Submit'. The 'Review & Submit' step is highlighted in dark blue. The main content area is titled 'TSCA Certification' and contains the following text:

I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate.

I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for protection for any confidential information made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that the person submitting the claim has:

- i. taken reasonable measures to protect the confidentiality of the information;
- ii. determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law;
- iii. a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of the person; and
- iv. a reasonable basis to believe that the information is not readily discoverable through reverse engineering.

Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.

At the bottom of the text area, there are two buttons: 'Cancel' and 'Confirm'.

The footer of the screenshot includes 'CDX Links' and 'CDX Helpdesk: (888) 890-1995'.

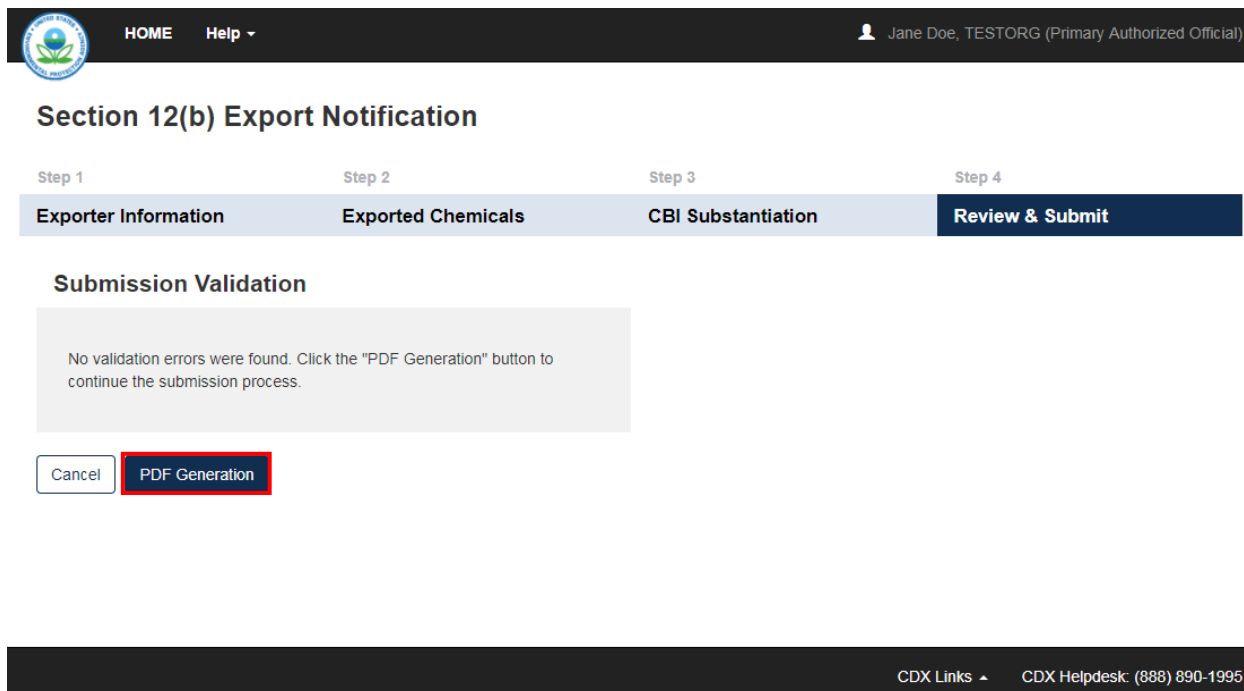
Navigation: Click the ‘Confirm’ button to certify regarding the contents of the form and navigate to the ‘Submission Validation’ screen.

6.2 Submission Validation

Click the ‘Confirm’ button from the ‘TSCA Certification’ screen to access the ‘Submission Validation’ screen. If no validation errors are found, you will be able to continue with the submission process. If any validation errors are found, you will have to correct those errors before continuing with submission. Refer to **Section 6** for further information on the validation process.

Exhibit 7-2 shows a screen capture of the ‘Submission Validation’ screen:

Exhibit 7-2 Submission Validation Screen



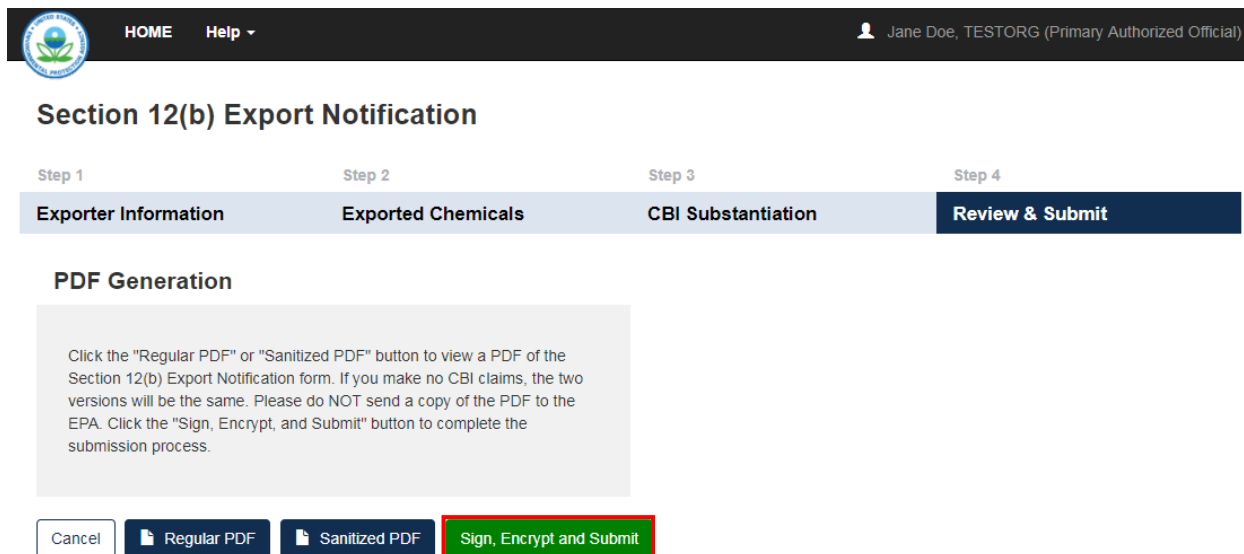
Navigation: Click the ‘PDF Generation’ button to continue to the ‘PDF Generation’ screen. A pop-up window will display informing you that a regular and sanitized PDF will be made. Click the ‘OK’ button to navigate to the ‘PDF Generation’ screen.

6.3 PDF Generation

Click the ‘PDF Generation’ button from the ‘Submission Validation’ screen to access the ‘PDF Generation’ screen.

Exhibit 7-3 shows a screen capture of the ‘PDF Generation’ screen:

Exhibit 7-3 PDF Generation Screen



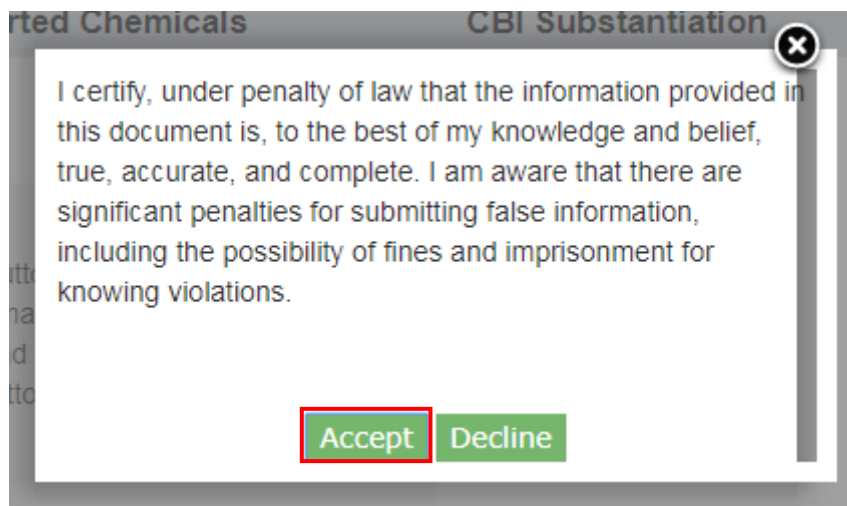
Navigation: Click the ‘Regular PDF’ button to generate a regular version of the Section 12(b) PDF. Click the ‘Sanitized PDF’ button to generate a sanitized version of the Section 12(b) PDF. Click the ‘Sign, Encrypt and Submit’ button to begin the CROMERR certification process.

6.4 CROMERR Certification

Click the ‘Sign, Encrypt and Submit’ button from the ‘PDF Generation’ screen to generate the ‘CROMERR Certification’ window.

Exhibit 7-4 shows a screen capture of the ‘CROMERR Certification’ window:

Exhibit 7-4 CROMERR Certification Window



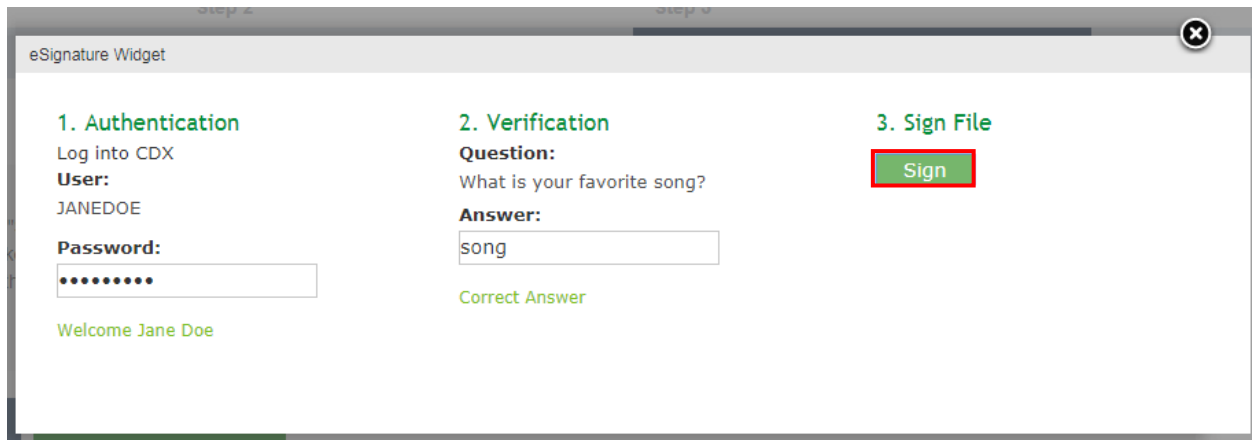
Navigation: Click the ‘Accept’ button to agree to the certification statement and generate the ‘eSignature Widget.’

6.5 eSignature Widget

Click the ‘Accept’ button on the ‘CROMERR Certification’ window to accept the certification statement and generate the ‘eSignature Widget.’ The ‘eSignature Widget’ will prompt for the CDX login password and an answer to one of your security questions. Click the ‘Sign’ button on the ‘eSignature Widget’ to navigate to the ‘Submission Finished’ screen.

Exhibit 7-5 shows a screen capture of the ‘eSignature Widget’ window:

Exhibit 7-5 eSignature Widget Window



The screenshot shows a window titled "eSignature Widget" with a close button in the top right corner. The window is divided into three sections:

- 1. Authentication:** Includes the text "Log into CDX", "User: JANEDOE", "Password:" followed by a masked input field, and a "Welcome Jane Doe" message.
- 2. Verification:** Includes the text "Question: What is your favorite song?", "Answer:" followed by an input field containing the text "song", and a "Correct Answer" message.
- 3. Sign File:** Includes a green "Sign" button highlighted with a red border.

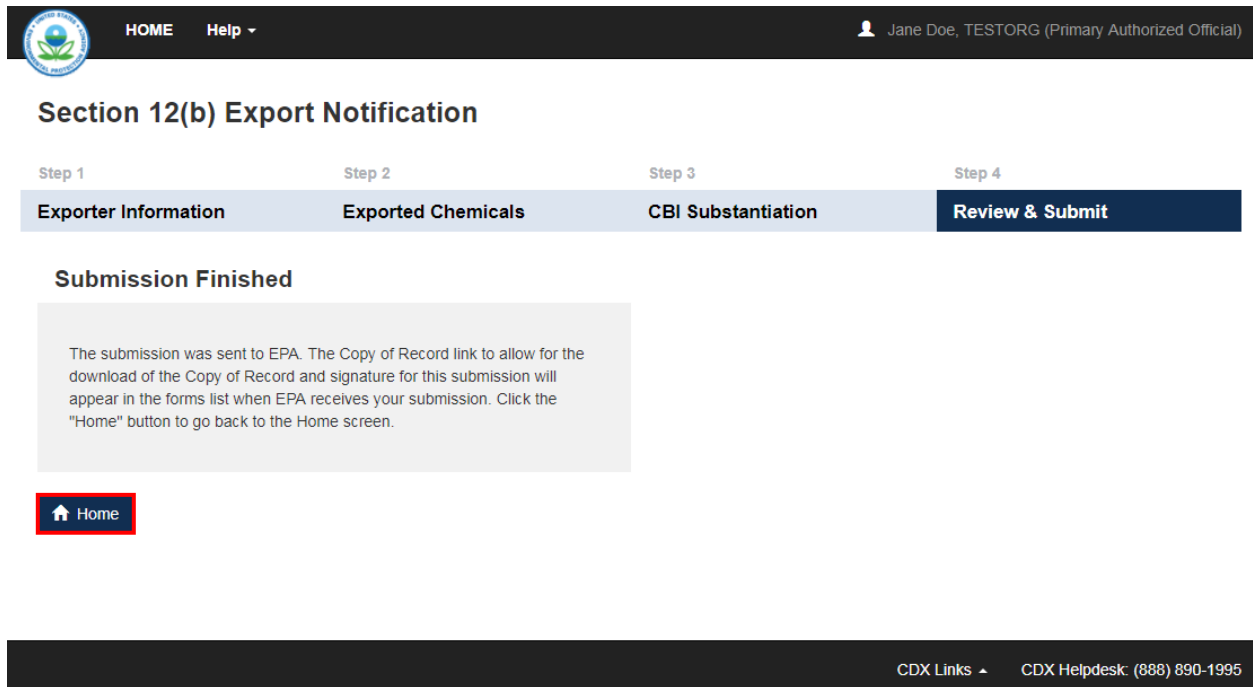
Navigation: Click the ‘Sign’ button on the ‘eSignature Widget’ to navigate to the ‘Submission Finished’ screen.

6.6 Submission Finished

Click the ‘Sign’ button on the ‘eSignature Widget’ to navigate to the ‘Submission Finished’ screen.

Exhibit 7-6 shows a screen capture of the ‘Submission Finished’ screen:

Exhibit 7-6 Submission Finished Screen



The screenshot shows the CDX interface for the 'Submission Finished' screen. At the top, there is a navigation bar with the CDX logo, 'HOME', 'Help', and a user profile for 'Jane Doe, TESTORG (Primary Authorized Official)'. Below this is the 'Section 12(b) Export Notification' header. A progress bar indicates four steps: 'Step 1 Exporter Information', 'Step 2 Exported Chemicals', 'Step 3 CBI Substantiation', and 'Step 4 Review & Submit'. The 'Review & Submit' step is highlighted in dark blue. Below the progress bar, the 'Submission Finished' section contains a message: 'The submission was sent to EPA. The Copy of Record link to allow for the download of the Copy of Record and signature for this submission will appear in the forms list when EPA receives your submission. Click the "Home" button to go back to the Home screen.' A 'Home' button with a house icon is located below the message. At the bottom right of the page, there are links for 'CDX Links' and 'CDX Helpdesk (888) 890-1995'.

Navigation: Click the ‘Home’ button to navigate back to the Section 12(b) ‘Home’ screen.

7 Download Copy of Record

To download a Copy of Record, navigate to the Section 12(b) 'Home' screen and locate a form alias for which you have successfully completed a submission and which has a status of 'Completed.'

Click the 'Copy of Record' icon (📄) from the 'Submission History' section of the Section 12(b) 'Home' screen to navigate to the 'Enter Passphrase' screen to login into CDX. The 'Enter Passphrase' screen requires you to enter the passphrase originally associated with the form. If the passphrase is entered correctly, you will view the 'CROMERR Certification' message where you can acknowledge the certification. Once you accept the certification, the 'eSignature Widget' displays where you provide the correct CDX password, answer the 20-5-1 question, and click the 'Sign' button. The copy of record .pdf files generate on the current page.

Exhibit 8-1 shows a screen capture of the 'Download Copy of Record' screen:

Exhibit 8-1 Download Copy of Record Screen

Section 12(b) Export Notification

Enter Passphrase

Submission Alias
12b-60-5143

Enter Passphrase ✓

Close

Please enter the form passphrase and click Open Copy of Record.

To download a Copy of Record, click on the green arrow under the Action(s) column.

File Name	File Size	Action(s)
CoR_TESTORG_12b_60_5143.pdf	16.44 KB	📄
Sanitized_CoR_TESTORG_12b_60_5143.pdf	15.79 KB	📄

CDX Links CDX Helpdesk: (888) 990-1995

Navigation: The screen displays the 'File Name,' 'File Size,' and 'Action' columns in a table format. Click the 'Copy of Record' icon (📄) to automatically download the .pdf file consisting of the individual regular or sanitized PDF.

8 Create an Amendment

To amend a submitted Section 12(b) form, navigate to the Section 12(b) 'Home' screen and locate a submission that you previously submitted with a status of 'Completed' within the 'Submission History' table. In addition to displaying a status of 'Completed' under the 'Status' column, the 'Lock' icon (🔒) will be displayed under the 'Action' column. Click the 'Lock' icon (🔒) under the 'Action' column to start an amendment.

A pop-up window will appear after clicking the 'Lock' icon (🔒), confirming that you wish to begin the amendment process. After you click the 'OK' button, you will be taken to the 'Enter Passphrase' screen. You must enter the passphrase originally associated with the submission to start the amendment process. After you enter the passphrase and click the 'Next' button, you will be taken to the first screen in the specific form. Refer to **Section 3.5** for further instructions on the 'Enter Passphrase' screen.

After a submission has been unlocked, the Section 12(b) 'Submission History' screen will display a status of 'In Progress' under the 'Status' column, and the 'Lock' icon (🔒) will no longer display under the 'Action' column; however, you will not see these changes until you navigate back to the Section 12(b) 'Submission History' screen. The only way to lock the submission again is by resubmitting it to EPA.

- Refer to **Section 4** through **Section 4.5** for instructions on editing a revised Section 12(b) Export Notification form.

9 Appendix A

The following is a list of the options available for the drop-down menu for a 'Section 12(b) Category':

- All 12(b) Categories
- Perfluoroalkyl Sulfonates (PFAS)
- Polychlorinated Biphenyls (PCBs)
- Polybrominated Diphenyl Ethers
- Substances contaminated with Halogenated Dibenzodioxins (HDDs)/ Halogenated Dibenzofurans (HDFs)
- Hexavalent Chromium Water Treatment
- Long Chain Perfluoroalkyl Carboxylate
- Nitrites of Alkali Metals (Group IA elements)
- N/A