



EPA

United States
Environmental Protection
Agency

Module 5: Using the e-CDRweb Reporting Tool

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Office of Chemical Safety and Pollution Prevention

PREFACE

Welcome to *Training Module 5:* *Using the e-CDRweb Reporting Tool*

This is the fifth in EPA's series of seven Training Modules to assist you in complying with the requirements of the CDR rule. This Training Module will explain how to access and use the e-CDRweb reporting tool so that you may prepare your 2012 CDR Form U.

Detailed information about using e-CDRweb can also be found in the *Instructions for the 2012 TSCA Chemical Data Reporting* guidance document available on EPA's website at www.epa.gov/cdr.

This Training Module does not substitute for the CDR rule and does not impose legally binding requirements on the regulated community or on the U.S. Environmental Protection Agency.



Training Agenda: Module 5

- Introduction
- e-CDRweb Features
- Using e-CDRweb
 - Accessing e-CDRweb on CDX
 - Validating and Certifying the Completed Form U
 - Submitting the Completed Form U
 - Accessing Information about a Form U
 - Amending a Previously Submitted Form U
- Submitting for the 2006 IUR
- Protecting CBI
- CDR Recordkeeping Requirements

Introduction

Electronic Reporting under the CDR Rule is Now Required.

- e-CDRweb is the free, EPA-provided reporting tool for completing and electronically submitting the CDR Form U
- The e-CDRweb:
 - Allows the user to enter CDR data anywhere an Internet connection is available
 - Is an interactive, user-friendly web-based tool that includes embedded help files
 - Does not require download or software install for use

IMPORTANT: *The 2006 eIUR desktop software is not applicable for 2012 CDR reporting*

e-CDRweb Features

The following features are built into e-CDRweb:

- Built-in validation
- Automated chemical identity checks
- Automated company and site identity checks
- Basic error checks and required field completion checks
Automatic generation of an encrypted file for electronic submission via CDX

e-CDRweb Features

Additional features assist Form U preparation:

- Form U can be completed in more than one session
- Form U can be saved for site records
- For companies with their own data collection process, eCDRweb allows direct data transfers
 - Companies can enter data directly into e-CDRweb by uploading an Extensible Markup Language (XML) file
- Amendments to previously submitted Form Us can be easily completed
- Joint submissions can be completed separately by the manufacturer and the supplier

See Module 6 for further information about joint submissions

Using e-CDRweb

Accessing e-CDRweb on CDX

- After you have registered with CDX*, you can begin to access e-CDRweb
- On the Chemical Safety and Pollution Prevention (CSPP) System home page, choose “Chemical Data Reporting (CDR)” as your submission type
- A passphrase is necessary for accessing a Form U**
 - A passphrase is used as an encryption key to protect data
 - The Authorized Official (AO) must create the passphrase and must remember it and distribute it only to authorized Supports for the site
 - If the passphrase is lost or forgotten, a new Form U must be created
- Multiple people can edit different pages of Form U at the same time

**See Module 4 for details on how to register with CDX, including identifying Authorized Officials and Supports*

***See Module 3 for details on how to complete Form U*



Using e-CDRweb

Validating and Certifying the Completed Form U

- After the Form U has been completed and the Authorized Official (AO) clicks “Submit,” a validation page appears if any errors or warnings are identified. The system will require you to address those issues before continuing
- A courtesy copy of the Form U can be printed for review and recordkeeping, but may not be submitted to EPA
- Only the AO may certify, electronically sign, and submit the Form U
- The AO provides his/her CDX user name and password to electronically sign and certify, which completes the certification statement required by EPA’s chemical data reporting regulations at 40 CFR 711.15(b)(1)
- e-CDRweb will encrypt the file and allow it to be saved on the user’s computer

Using e-CDRweb

Submitting the Completed Form U

- The Authorized Official must answer one of the security questions previously chosen during CDX registration in order to proceed
- The Authorized Official clicks “Confirm” to submit the completed Form U to EPA via CDX. If the Authorized Official does not want to submit at this time, click “Cancel.”
- Once the Form U is submitted to EPA, a “successful submission” screen will appear
- After the Form U is processed and the Authorized Official’s signature validated by EPA, a confirmation e-mail will be sent to both the Authorized Official's registered e-mail address and the Authorized Official’s CDX inbox
- A printable, encrypted copy of the submitted Form U may be downloaded from the e-CDRweb “Forms” tab

Using e-CDRweb

Accessing Information about a Form U

- To verify the status of a Form U, log into e-CDRweb and click the “Forms” tab and the status column will indicate whether a form:
 - Has not been started
 - Is in-progress
 - Has been certified
 - Has been submitted
- An in-progress Form U cannot be cancelled; however if it is never submitted, EPA will never receive it and it will effectively be cancelled
- To view which chemical substances were included in a previously submitted Form U, click “Copy of Record” to view and print a copy
- To view which chemical substances are included in an in-progress Form U, click the Site link, enter the passphrase for that Form U, and the navigation tree will display the chemical substances included

Using e-CDRweb

Amending a Previously Submitted Form U

- Once a Form U is submitted to EPA, the file will be locked. If it is necessary to make changes, the form must be unlocked.
- An Authorized Official must log in to CDX first and affirm in a multi-step process that an Amendment is being made to unlock the form
- Only an AO or a Support (after the AO unlocks the form) can amend a previously submitted Form U
- While a Support can save, finalize or cancel an amendment, only an AO may sign and submit the amended form
- Cancelling an amendment will revert back to the previously signed Form U
- If the reporting period is ending and amendments have been made but not submitted to EPA, the AO and any Supports will receive notices reminding them the Form U must be signed and submitted to EPA to be considered valid

Reporting for the 2006 IUR

Companies wishing to submit information for the 2006 IUR submission period need to do the following:

- Download the IUR 2006 software from the EPA webpage titled “2006 Resources Archive” at <http://www.epa.gov/iur/tools/2006resourcesarchive.html>
- Refer to 2006 guidance documents also available on that webpage
- Generate a new 2006 Form U and complete using instructions for 2006 reporting
- Print the completed Form U and mail it to EPA
- The 2006 Form U cannot be sent electronically

- ***Note:*** A paper form will only be accepted by EPA for reporting for the past 2006 IUR submission period. For the 2012 submission period, EPA will only accept electronic Form Us prepared using the e-CDRweb tool and submitted through CDX

Protecting CBI

Confidential Business Information (CBI) is protected when e-CDRweb and CDX are used to submit a Form U as follows:

- e-CDRweb encrypts submissions using a Federal Information Processing Standards (FIPS) compliant encryption module
- File remains encrypted:
 - During transmission to CDX
 - While stored in CDX
 - During transmission to EPA's operational data repository
- File can only be decrypted with EPA's private key when it reaches its final destination
- EPA is the only party that can convert encrypted text back to readable text

CDR Recordkeeping Requirements

- You must maintain records that document any CDR information reported to EPA for five years beginning on the last day of the applicable submission period
 - For the 2012 submission period ending June 30, 2012, the records on which the CDR report is based must be retained until June 30, 2017
- You determine the format
 - Consistent with normal business practices
 - Required records include those that show production volume, plant site, and site-limited status of each chemical substance reported
- EPA suggests, but does not require, the following:
 - Keeping records for longer than 5 years to refer to, when new Form Us are being prepared
 - Keeping records to document your reasons for not filing a Form U; for example, records to show that annual production volume at a site was less than 25,000 lb

Where to Obtain Help

- Chemical Data Reporting website: www.epa.gov/cdr
- TSCA Hotline:
 - (202) 554-1404
 - tsca-hotline@epa.gov

Training Modules for CDR Rule

- There are seven Training Modules for the CDR rule. The Training Module you have just completed is highlighted below in the list of all seven Training Modules. You may select another Training Module if you wish to continue your review of the CDR.

[Module 1: IUR Modifications and CDR Final Rule \(August 2011\)](#)

[Module 2: Reporting Requirements for the 2012 CDR](#)

[Module 3: Completing Form U for 2012](#)

[Module 4: Registering with CDX for CDR Reporting](#)

Module 5: Using the e-CDRweb Reporting Tool

[Module 6: Joint Submissions](#)

Module 7: Byproducts