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*The New Chemicals Program  
Under Section 5 of TSCA*

*Topic: “Incomplete Notices”*

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# *EPA's Process for Screening Notices for Completeness*



■ *Prescreening*

■ *Screening after Day 1*

■ *Disposition*

# *Prescreening*

- *Occurs before Day 1, as soon as notice is received*
- *Quick review for errors, omissions, inconsistencies or ambiguities*
- *Focuses mostly on information on chemical identity of reported substance*
- *~27% of notices are declared incomplete at the Prescreen stage*
- *Time limitations preclude comprehensive screening at this stage*

# *Screening After Day 1*

- *Comprehensive screening performed as part of formal review process*
- *Catches specific errors not found at Prescreening stage*
- *~ 5% of the notices are deemed incomplete at this stage*

# *Disposition*

- *Notices declared incomplete during Prescreen will be mailed back to submitters along with check list of problems identified*
- *After Prescreen, submitters will only receive a letter with an accompanying check list*
- *EPA will not further review such notices*
- *Corrected notices must be resubmitted in their entirety and a new case number will be assigned*
- *IMD will address incomplete notice user fees*

# *Common Errors in Notices*

- *Wrong chemical name*
- *Inconsistencies*
- *Incorrect/insufficient structural diagrams*
- *Page 5 not filled out for polymers or oligomers*
- *Missing identification for Class 2 chemical precursor(s) or polymer monomer(s)*

# *Common Errors (con't)*

- *Incomplete manufacturing information*
- *Method 1 not used for consolidated PMNs*
- *Support letter not provided for a reactant or PMN substance not fully identified*
- *Incorrect molecular formula*
- *Insufficient or deceptive generic chemical name*
- *Failure to make all needed corrections*

# *Wrong Chemical Name*

- *Incorrect CA (9th CI) name consistent with EPA's TSCA Inventory nomenclature policy*
  - *Synonyms*
  - *Common names*
  - *Trade names*
  - *IUPAC names*
- *Not all CA names are acceptable*
  - *Hydrates*
  - *Many SRU polymer names*
  - *Graft/block polymer names will not be used*



# *Inconsistencies*

- *EPA unable to determine which part of submitted information is correct*
- *May involve two or more types of chemical identity-related information*
  - *Chemical name*
  - *CAS number*
  - *Molecular formula*
  - *Structural diagram*
  - *Identity of immediate precursor(s) or monomer(s)*
  - *Manufacturing process information*

# *Inconsistencies (con't)*

- *Inconsistencies will cause notices (even those using Method 1) to be deemed incomplete*
- *Do not provide to CAS (or anyone else, e.g., a consultant) any information different than that which will be submitted to EPA - present the same information in the same manner*
- *Errors may involve use of the “two percent rule” for polymers*

# *Incorrect/Insufficient Structural Diagram(s)*

- *Incomplete/incorrect Class 1 substance structure*
- *Incorrect representative/partial structure diagram for Class 2 substance or polymer - does not contain all details reasonably ascertainable*
- *Allowed abbreviations:*

*Me (methyl)*

*Bu (butyl)*

*Et (ethyl)*

*i-Bu (iso-butyl)*

*Pr (propyl)*

*s-Bu (sec-butyl)*

*i-Pr (iso-propyl)*

*t-Bu (tert-butyl)*

*Ph (phenyl)*

# *Failure to Fill Out Page 5 for Polymers or Oligomers*

- *Page 5 is required to be filled out for all substances containing or based on*
  - *a polymer, or*
  - *oligomer of variable molecular weight*
- *“Typical composition” values or ranges for reactants must be > 0%*

## *Missing Class 2 Chemical Precursor or Polymer Monomer Identification*

- *Missing specific chemical name and/or available CAS number for immediate precursor or monomer*
- *Free-radical initiators or chain-transfer agents used must be listed as reactants*
- *9th CI CAS nomenclature not needed for listing immediate precursors or monomers - however the chemical name used must be sufficiently specific*

## *Incomplete Manufacturing Information*

- *Manufacturing process information (i.e., specific name (and/or CAS number) and weight) missing for each starting material*
- *All non-reactants must be included*
  - *catalysts*
  - *solvents*
  - *other*

## *Method 1 Not Used for Consolidated PMNs*

- *Submitter did not use Method 1 to obtain correct chemical names for all substances reported in consolidated PMNs*

## *Support Letter Not Provided for Reactants or PMN Substances Not Fully Identified*

- *Applies in cases in which a supplier withholds full identification of a substance*
- *If a foreign supplier withholds full identity of the PMN substance to be imported, the supplier must provide a “Support Letter” with the correct CA (9th CI) name and all other identity information required for that type of substance*
- *If a “Support Letter” is needed to identify a reactant, the CA (9thCI) nomenclature requirement for the PMN substance is waived*



## *Remaining Common Errors*

- *Incorrect Molecular Formula*
- *Insufficient or Deceptive Generic Name Provided*
- *Failure to Make All Needed Corrections*

*Remember that submitted information must be correct as well as complete!!*

## *Error Screening “Check List”*

- *Will be filled out and attached to an incomplete notice when EPA mails it back to the submitter*
- *A check mark will indicate the general nature of each error, omission, inconsistency or ambiguity*
- *EPA chemists may add handwritten notes elaborating on the nature of the identified problem*
- *The “Check List” is not intended to explain exactly how to “fix” the notice or develop the correct 9th CI CAS name(s)*

# *EPA Recommendations*

- *When using Method 1:*
  - *Fill out pages 4 or 5, 6 and 8 of EPA's PMN form to provide complete chemical identity information to CAS*
  - *Be sure to attach the CAS-developed nomenclature report to the PMN*
  - *Look for corrections on the structure diagram, molecular formula, monomer/reactant identities that CAS (or other source) may have made on your order*

## *EPA Recommendations (con't)*

- *Before submitting a notice to EPA, have a person knowledgeable in chemistry proofread and fully review the notice for typos, accuracy, and consistency*
- *Do not ask CAS any questions about EPA's TSCA Inventory nomenclature policy or PMN reporting policies/rules*