



*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*