

US EPA ARCHIVE DOCUMENT

# **E-Submission Preparation and Quality Checks**

*PPDC PRIA Process Improvement Workgroup Meeting*

*Bob Manfre*

**BASF Corporation**

**Manager, Global Regulatory Services – RTP**

**Chair, CLA E-Submissions Working Group**

**April 19, 2011**

**Crop Protection**

 **BASF**  
The Chemical Company

# E-Submission Preparation & Quality Checks

## ■ Topics

- History
- BASF 'XML Builder'
- Quality Checks – Pre/Post Electronic
- Questions

# E-Submission Preparation & Quality Checks

## ■ History

- First e-Submission: picolinafen (BAS 700 H) in 2000 (Cyanamid) to PMRA
- First EPA e-Submission: boscalid (BAS 510 F) in 2001 (BASF)
- From 2001-2007, ca. 55 paper/e-Subs completed. Compiled in MRID folder hierarchy format with 'smart' PDFs.
- From 2008 – present, ca. 125 paper/e-Subs completed.  
(MRID folder hierarchy format)  
ca. 175 e-sub in XML/PDF format only!





# E-Submission Preparation & Quality Checks

## ■ e-Sub Categories


- Currently, e-Subs can only be sent in for...
  - Section 3's
  - EUP's
  - Tolerance petitions
  - Distributor products
- 6(a)(2) 8ee – can be handled as well provided it refers to an existing Sec. 3 registration
- Others under consideration (*which are also PRIA actions*)
  - "Pre-Application" applications
  - Inert Ingredient clearances
- Data call-ins – tracked differently and would not interface with current e-Sub system. Changes may be made to accommodate these.

# E-Submission Preparation & Quality Checks

## ■ BASF 'XML Builder'

- Java-based web application front-end that contains all elements of the E-PRISM data dictionary and interfaces directly to our Documentum study report system (REGY)
  - Allows input of BASF Reg. Doc. #s
  - Extracts metadata from Documentum 
  - Pre-selected and enduser-selected E-PRISM data (e.g CBI designation) 
  - Handles ALL mandatory fields (e.g PRIA action, contact info, registration type, application type, Me-Too indicator) 
  - Compiles final XML file 

# E-Submission Preparation & Quality Checks





RGA Home | [E-Index Builder](#)

[E-Index Builder](#) > [Create XML](#)

---

## Create E-Index XML File for EPA -- Submission

Please enter or select values below that are required for this EPA submission. Ⓡ: required field  
Please do not include special characters representing bigger than, less than and and. They interfere with XML tags.

<span style="color: red;">Ⓡ</span> <b>Company Contact Info</b> (Limit to 500 characters)	<input type="text" value="Bob Manfre, BASF Corp"/>	     
<span style="color: red;">Ⓡ</span> <b>PRIA Action</b>	<input type="text" value="Y"/>	
<span style="color: red;">Ⓡ</span> <b>Regulatory Type</b>	<input type="text" value="R(Product Registration - Section 3)"/> T(Tolerance petition) X(Experimental Use Permit - Section 5)	
<span style="color: red;">Ⓡ</span> <b>Application Type</b>	<input type="text" value="Select one or more..."/> A(New Registration) C(Amendment)	
<b>Parent Section 3</b> (Limit to 2 characters)	<input type="text"/>	
<b>Product Name</b> (Limit to 100 characters, no commas ",")	<input type="text" value="AC 375839"/>	
<span style="color: red;">Ⓡ</span> <b>Me-Too Indicator</b>	<input type="text" value="N"/>	
<input type="button" value="Submit"/>		

# E-Submission Preparation & Quality Checks

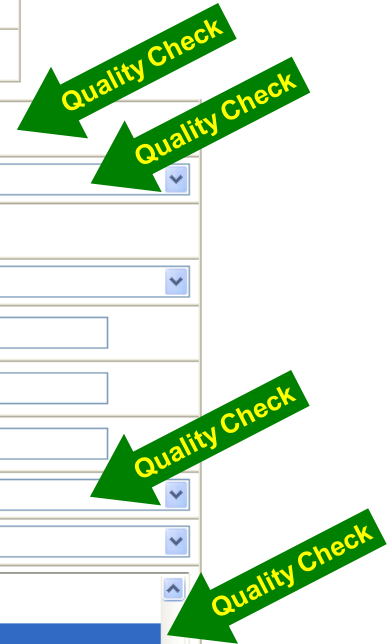
## REGY Metadata

Report No.:	2000/7000144
Title:	AC 375839 (CL 375839): Storage stability of AC 375839 residues at less than -18°C in grapes and wine
Author(s)	Class, T.
Completion Date	2000-10-27
MRID	
Lab Report No	US-P 384 G, US-CFS DER 138
Published	N
EPA Guidelines	EPA 860.1000 EPA 860.1380

## XML File Record




OECD Data Point(Cannot have commas, please use semi-colon or other delimiters)	<input type="text" value="IIA 6.1.1"/>		
Document Type	ST(Study)		
Product Name(Limit to 100 characters, no commas ",")	<input type="text" value="AC 375839"/>		
Document Group	Metabolism and Residue		
Admin Number Type	Select one...	Admin Number	<input type="text"/>
Admin Number Type	Select one...	Admin Number	<input type="text"/>
Admin Number Type	Select one...	Admin Number	<input type="text"/>
CBI Status (EPA)	0(No CBI)		
Content Category	01(Complete primary report -- experimental research)		
Guideline Number	860.1340 Residue analytical method 860.1360 Multiresidue method <b>860.1380 Storage stability data</b> 860.1400 Water, fish, and irrigated crops 860.1460 Food handling 860.1480 Meat/milk/poultry/eggs		
Number of Pages (Required by EPA for Studies only, must be a number)	<input type="text" value="110"/>		
Select a File (file name cannot have commas ",")	<input type="text" value="C:\Documents and Settings\manfrer\My Documents\My Document"/> <input type="button" value="Browse..."/>		

**Note:**  
All enduser-selected data is stored back in REGY for potential re-use





# E-Submission Preparation & Quality Checks

- XML file is combined with all PDFs and zipped
- Prior to zipping, we run a small Visual Basic app "E-PRISM Validator" to check if any PDFs are duplicated (*not allowed*) 
- Zip file is burned to CD
- CD is checked by re-opening all files 
- CD + copy of CD label are sent with request to pin-punch copy of CD label and return as proof of receipt.   
(*If paper sub only, 1<sup>st</sup> page of cover letter is requested for pin-punching.*)

# E-Submission Preparation & Quality Checks

- **Items checked during proofing documents for an EPA submission**
  - No shading
  - No skewed pages
  - Legibility
  - All pages printed
  - No foreign language without translation
  - Signatures on pages 2 and 3
  - Page 2 = Company agent signature
  - Page 3 = Study Director, Sponsor & Submitter signatures
  - If page 3 refers to another page for the Study Director's signature, that page number is correct
  - Paginated with unique number (usually the Reg. Doc #) and page x of y
  - Confidential Appendices must be paginated separately from the study
  - No holes punched in data tables or report. This includes blank spaces from copying
  - Correct table / figure / appendix numbering



# E-Submission Preparation & Quality Checks

