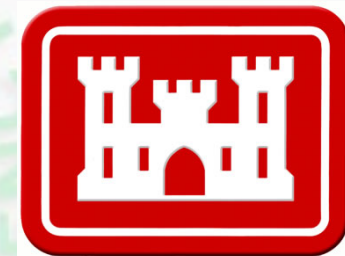


Self-Disclosing Violations to EPA: Why Do It & How?



**Federal Environmental
Symposium
October 30, 2019**



**US Army Corps
of Engineers®**

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Topics to be Covered:



- What is the Audit Policy & How Does it Work?
- Audit Policy Conditions & Incentives
- Voluntary Disclosures in the Electronic Age
- Refresh
- Common Misconceptions Addressed
- Feedback from Federal Users
- Demonstration of eDisclosure Process
- Questions

Brief History of Audit Policy:



April 2000 – EPA issues revised Final Policy Statement which is the current Audit Policy.

April 2007 – EPA issues Audit Policy Frequently Asked Questions. The FAQs supplemented the 1997 Interpretive Guidance.

August 2008 – EPA announces “Interim Approach to Applying the Audit Policy to New Owners” and eDisclosure Pilot.

December 2015 – EPA announces the launch of eDisclosure.

May 2018 – EPA announces “Refresh” renewed emphasis on self-disclosed violation Policies.

EPA's Self-Policing (Audit) Policy:



“...is designed to achieve greater compliance with Federal laws and regulations that protect human health and the environment. It promotes a higher standard of self-policing by waiving gravity-based penalties for violations that are promptly disclosed and corrected, and which were discovered systematically – that is, through voluntary audits or compliance management systems.”

Significant Benefits:



- ***Win-win-win for regulated community, EPA, and the environment.***
 - Site visits and lawsuits are resource-intensive to government and regulated community.
 - Everyone benefits when voluntary self-auditing replaces costly inspections and litigation.
- Provides innovative, resource-effective mechanism for achieving compliance in a sector or geographic area.
- Ensures national consistency for penalty mitigation for voluntary disclosures.

Benefits Continued...



- ***No gravity-based penalties*** if all policy conditions are met (75% reduction if all conditions met, except violations not found through an audit or compliance management system).
- ***No recommendation of criminal charges*** against regulated entity unless:
 - prevalent management philosophy to conceal or condone violations.
 - high-level corporate involvement in, or willful blindness to, violations.

Audit Policy Conditions:



1. **Systematic Discovery** - *required for 100% penalty mitigation, otherwise only 75% mitigation*
2. **Voluntary Discovery**
3. **Prompt Disclosure** – *within 21 days of discovery*
4. **Discovery, Disclosure Independent of Government/Third Party Plaintiff**
5. **Correction and Remediation** - *within 60 days after discovery unless written agreement/order*
6. **Prevent Recurrence**
7. **No Repeat Violations** – *can't have same or closely related violation at same facility w/i past 3 yrs*
8. **Other Violations Excluded** – *serious actual harm, imminent and substantial endangerment*
9. **Cooperation**

Why Create eDisclosure?



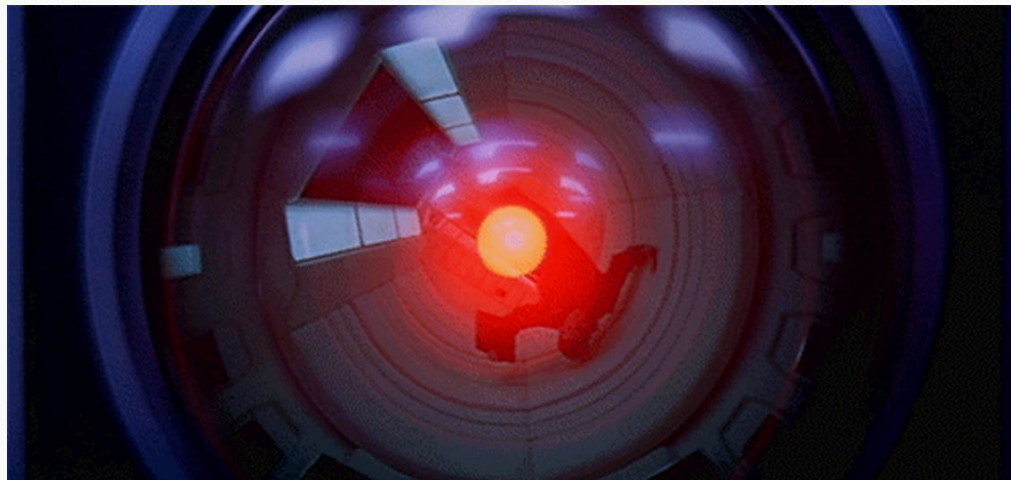
So many entities disclosed violations that we could not always provide excellent customer service in terms of response times. We could not keep up with the pace of disclosures.



Key Points:



- EPA launched eDisclosure on December 9, 2015, to modernize implementation of its self-disclosure policies.
- eDisclosure is a web-based system for receiving and automatically processing violations disclosed to EPA pursuant to EPA's Audit Policy.
- Upon certification of compliance, it immediately and automatically issues an electronic Notice of Determination (eNOD) to EPCRA disclosers who meet longstanding criteria programmed into the system.



What's In It For Me?



- Such eNODs resolve the discloser's civil penalty liability with no assessment of civil penalties (subject to the completeness and accuracy of the disclosure and certification).
- Other regulated entities can obtain Acknowledgement Letters, which provide a useful record of EPA's receipt of the disclosure of non-EPCRA violations.
- Such letters state that EPA will make a determination as to eligibility for penalty mitigation if and when it considers taking enforcement action for environmental violations.
- eDisclosure provides for limited extensions of time to correct violations, and such extensions are automatically and immediately processed by the system.

More on Extensions:



- What if more than 21 days is needed to disclose violations?
- Prior to eDisclosure, EPA often granted more time to disclose violations, usually through audit agreements. EPA is no longer entering into audit agreements outside the New Owner context.
- The automated eDisclosure system does not provide for extensions to the 21-day disclosure deadline. But, EPA has emphasized its longstanding interpretation that the 21-day clock does not begin until the discloser has an objectively reasonable basis for believing that a specific violation may have occurred.
- “Discovery” is not when the discloser has started or stated its intent to audit or otherwise look for violations, but instead when it has found that violations likely occurred.

. . . so how is eDisclosure going so far?

Status of eDisclosure:



Success of eDisclosure:



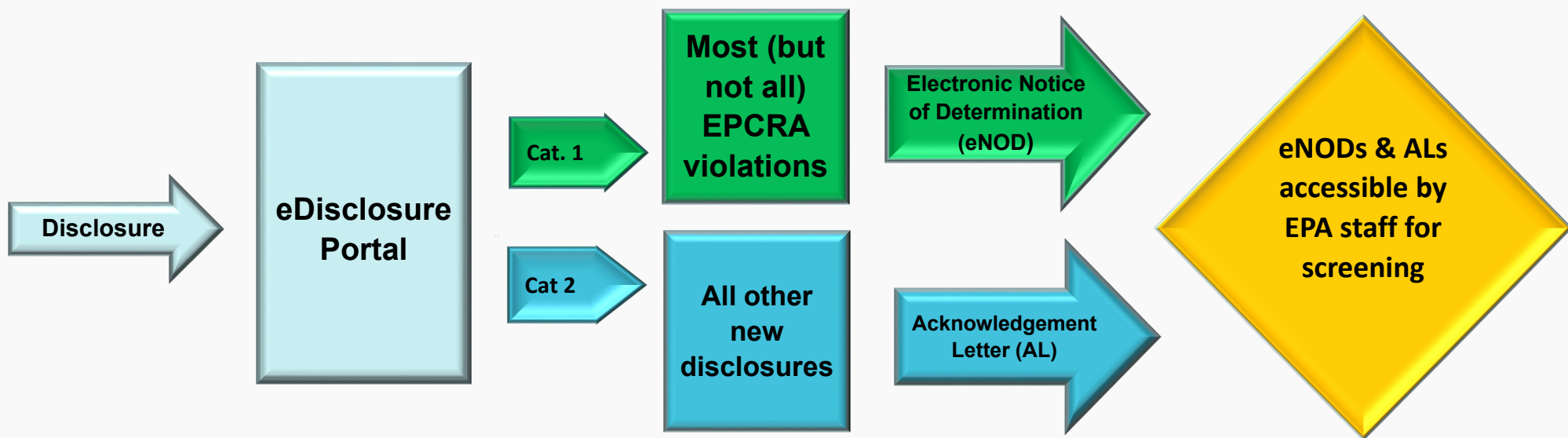
- eDisclosure is already producing the benefits that EPA sought when it launched this system.
- It is saving the regulated community and EPA significant time and money by automatically processing disclosures immediately upon a violator's certification of compliance, eliminating back-and-forth communications with EPA and sometimes lengthy delays.
- Industry reaction to the portal launch has been largely very favorable, and the federal sector has submitted a handful of disclosures.

How It Works:



- Register to File With the Centralized Web-Based Portal (CDX) - cdx.epa.gov
- Submit Violation Disclosure Report (eDisclosure)
- Certify Compliance - Submit Compliance Report (eDisclosure)

Two-Category System with Different Types of Resolution:



Tips for Successful eDisclosures:



- Request correction extensions before 60 days from date of discovery.
- For EPCRA disclosures, include all violations in compliance report (all years, all chemicals).
- Save compliance report as draft to see outcome based on information provided.
 - Double check your submission.

Post-Submission Follow-Up:



Category 1 Submissions:

- EPA will spot check to ensure conformance with EPCRA, the Audit Policy, and eDisclosure requirements.



Category 2 Submissions:

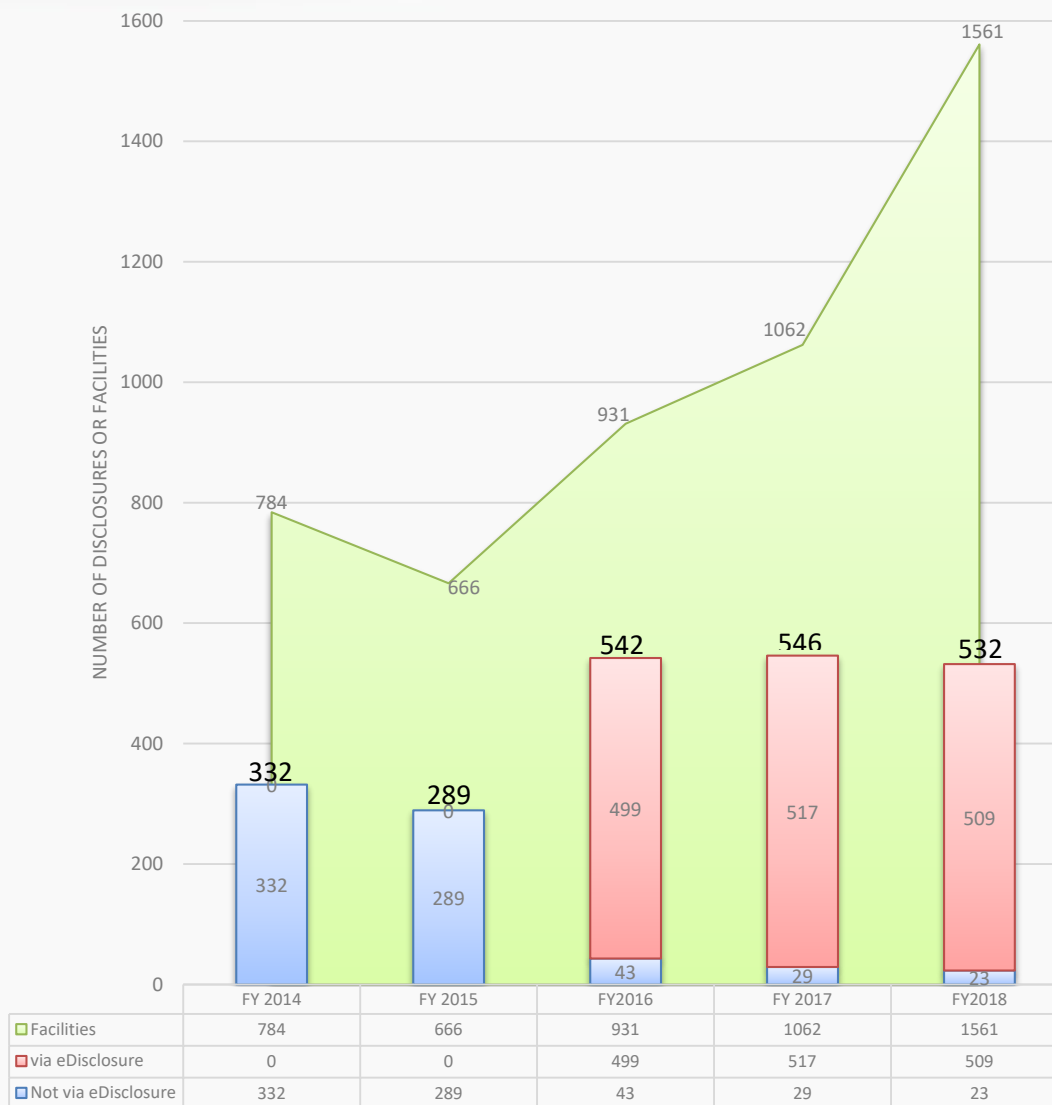
- EPA will screen for significant concerns (e.g., criminal conduct, imminent hazard).
- If and when EPA decides to take an enforcement action for environmental violations, it will then make a determination as to whether the discloser is eligible for penalty mitigation.

EPA Approach to FOIA Requests Seeking Disclosures:



- EPA has always considered *resolved* Audit Policy disclosures as publicly releasable under FOIA and plans to continue such policy (see 1997 Memo “Confidentiality of Information Received Under Agency’s Self-Disclosure Policy”).
- The 1997 memo also states that EPA can withhold *unresolved* disclosures pursuant to the FOIA “law enforcement proceeding” exemption, Exemption 7(A).
- In response to any requests for individual *unresolved* disclosures, EPA will determine on a case-by-case basis whether it reasonably foresees that release would harm an interest protected by a FOIA exemption.
- EPA generally expects to conclude its screening of Category 1 and Category 2 disclosures within a relatively short period of time after their receipt, at which time they may be releasable upon request (e.g., pursuant to a FOIA request).

Voluntary Disclosures FY14-18:



Data Source: Integrated Compliance Information System (ICIS) and eDisclosure System
 Prepared by: OCE/XPS
 Data as of: Nov-5-2018

Statistical Snapshot:



- Through September 2019, over 2100 disclosures have been submitted electronically (21 submitted by federal facilities). For FY 2018, EPA received 532 disclosures, an increase of ~75% over the average of roughly 300 disclosures annually prior to launch.
- Over 2050 eNODs have been issued thus far (some disclosures contain multiple violations and receive multiple eNODs).
- Pre-eDisclosure, about 55% of disclosures involve EPCRA violations. Now, approximately 57% of disclosures are for EPCRA violations; the remainder involve violations of TSCA, CAA, CWA, RCRA, and FIFRA.
- The number of eNODs and the number and variety of disclosures shows that implementation of eDisclosure is effective in retaining EPA's longstanding incentives to voluntarily discover, promptly disclose, and expeditiously correct environmental violations.

Audit Policy Refresh:



Through the Audit Policy Refresh, EPA:

- Clarified several features of its self-disclosure policies in response to some common misconceptions in the regulated community. See [Refresh statement](#);
- Plans to supplement its existing interpretive guidance to address a number of additional issues that the regulated community has raised to EPA.

Common Complaints/Misconceptions:

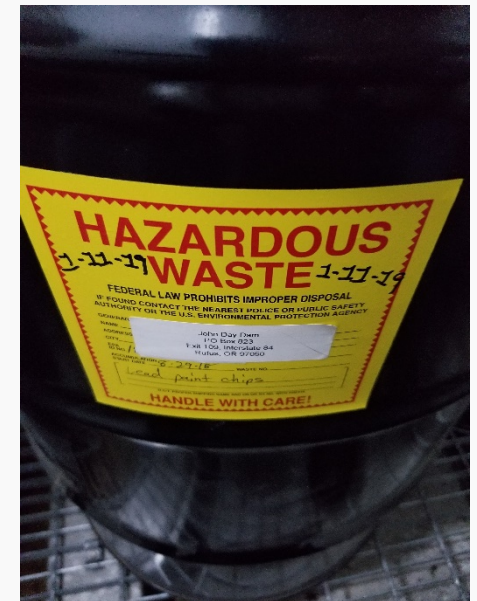


- The 21-day time frame to disclose is not long enough to run the disclosure through the bureaucracy and get the necessary approvals.
- Similarly, the 60-day time frame to return to compliance isn't long enough to actually attain compliance.
- By submitting disclosures, facilities become targets for inspection & possible follow-up enforcement.
- By disclosing, facilities are acknowledging that there was a violation.
- Disclosures are publicly available.

Feedback from Federal Users:



- Ken Duncan, U.S. Army Corps of Engineers, Portland District
- March 4, 2019 – Discovered RCRA violations during an internal audit.
- Worked w/ Management, Counsel, and Oregon DEQ Technical Assistance to complete a traditional disclosure on 25 March.
- DEQ completed a technical assistance visit in May.
- Corrections completed w/in 90 days.
- Challenges – meeting the time constraints.



Feedback from Federal Users:



Ariane Glover, Eielson Air Force Base

- Overall user experience positive...
 - Helps establish trust - informs regulators of challenges and corrective actions.
 - Helps program management - fits within Air Force's EMS framework for self-identification and continuous improvements and elevates issue awareness when tracked at regulatory agency level.

eDisclosure process

- Needed EPA helpdesk to assist with account set-up.
- EPA staff was available to answer policy questions.

-- 21 days is sufficient – disclosure approval delegate to level where only ½ dozen people have to approve (Squadron Cmdr and Staff Judge Advocate). Worked with each new Commander to explain eDisclosure and get buy-in.



Feedback from Federal Users:



Ariane Glover, Eielson Air Force Base continued

- Other observations:
 - Wondered where does disclosure go? Region indicated aware of disclosures
 - Only regulated by EPA (no Authorized state RCRA program)
- Facility has not been inspected since launch of eDisclosure.
- Compliance with environmental requirements prevents distraction from primary mission to fly, fight, and win.
- Positive experiences with Region 10, additional compliance assistance contact outside compliance monitoring inspections, regional POCs have been consistent over time.



Demonstration of eDisclosure Process



- Link to test site: <https://test.epacdx.net/>

Questions?



For More Information:



- Audit Policy Information:
 - <https://www.epa.gov/compliance/epas-audit-policy>
 - FedCenter.gov
- eDisclosure Information:
 - <https://www.epa.gov/compliance/epas-edisclosure>
 - FedCenter.gov
- Questions about the Audit Policy, contact Phil Milton, National Audit Policy Coordinator at (202) 564-5029, or milton.philip@epa.gov, or Dominique Freyre at (202)-564-0433 or freyre.dominique@epa.gov

CDX Home Page



CDX is accessible at <https://cdx.epa.gov> . This will take you to the Central Data Exchange home page. Click on the “Register with CDX” button to start creating a new account as shown in Figure 1-1. You can also use the following URL: <https://cdx.epa.gov/RegistrationRequest?Dataflow=eDisclosure>. This will route you directly to the Terms and Conditions page.

Figure 1-1 CDX Home Page

The screenshot shows the EPA Central Data Exchange (CDX) home page. At the top is the EPA logo and the text "United States Environmental Protection Agency". Below this is a navigation bar with links: Home, About, Recent Announcements, Terms and Conditions, and Help. The main header area includes the "CDX Central Data Exchange" title and a "Contact Us" link. The central part of the page features a large image of a waterfall with binary code overlaid. To the right of this image is a login section titled "Log in to CDX" with fields for "User ID" and "Password", and buttons for "Log In" and "Register with CDX". Below the login section are links for "Forgot your Password?", "Forgot your User ID?", and "Warning Notice and Privacy Policy". The main content area has a "Welcome" heading followed by a paragraph describing the CDX as the EPA's electronic reporting site. At the bottom, there is a blue bar with the text "Warning Notice and Privacy Policy" and a white bar below it with the text "Warning Notice".

Terms and Conditions



Click on the “I Accept” radio button and the “Proceed” button when ready (Figure 1-2). You will not be able to proceed with registration until the Terms and Conditions have been accepted.

Figure 1-2 CDX Terms and Conditions Page

The screenshot shows the "CDX Terms and Conditions" page on the EPA website. The page has a blue header with the EPA logo and navigation links: Home, About, Recent Announcements, Terms and Conditions (selected), and Help. Below the header, the "CDX Terms and Conditions" section is displayed. It includes a paragraph about the requirement for a user ID and password, a "Warning Notice" section with a list of five points regarding U.S. Government information access, and two radio buttons for "I Accept" and "I Decline". At the bottom, there are "Proceed" and "Cancel" buttons. A "Contact Us" link is also visible in the top right of the content area.

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CDX Terms and Conditions [Contact Us](#)

The access and use of CDX Registration for the electronic submittal of environmental information require the creation of a user ID and password that I must maintain and keep confidential. I will review the following steps concerning the creation and maintenance of a user ID and password.

Warning Notice

In proceeding and accessing U.S. Government information and information systems, you acknowledge that you fully understand and consent to all of the following:

1. you are accessing U.S. Government information and information systems that are provided for official U.S. Government purposes only;
2. unauthorized access to or unauthorized use of U.S. Government information or information systems is subject to criminal, civil, administrative, or other lawful action;
3. the term U.S. Government information system includes systems operated on behalf of the U.S. Government;
4. you have no reasonable expectation of privacy regarding any communications or information used, transmitted, or stored on U.S. Government information systems;
5. at any time the U.S. Government may for any lawful government purpose without notice monitor intercept search

☐ I Accept
☐ I Decline

Proceed **Cancel**

Select Program Service



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Core CDX Registration [Contact Us](#)

1. Program Service

2. Role Access

3. User and Organization

4. Confirmation

Begin typing a program service name or related keywords to filter the list of available services (e.g., air quality system, AQS, or Clean Air Act).

Active Program Services List

eD

ACRES: Assessment Cleanup and Redevelopment Exchange System

CEDRI: Compliance and Emissions Data Reporting Interface

CROMERRS: CROss-Media Electronic Reporting Rule Services

CSPP: Submissions for Chemical Safety and Pesticide Programs

eDisclosure: Voluntary Disclosure System

LEAD: Lead-Based Paint Program


OTAQEMTS: Office of Transportation and Air Quality EPA Moderated Transaction System

OTAQWaiverCredits: Cellulosic Biofuel Waiver Credits Pay.gov Application


PSP: Pesticide Submission Portal

Select Role



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 **Core CDX Registration** [Contact Us](#)

1. Program Service ✓

2. Role Access

3. User and Organization

4. Confirmation

Registration Information

Program Service	Voluntary Disclosure System
Role	Not selected

Select a role from the drop down list and provide any required additional information, if applicable.

By clicking Request Role Access, you understand that you intend to disclose to the United States Environmental Protection Agency (EPA) potential violations of Federal Environmental Laws, regulations, and/or requirements. EPA will assess your disclosure and provide a notice of determination or acknowledgement letter in accordance with Audit Policy/ Small Business Compliance Policy.

Select Role

Discloser/Certifier ▾

Request Role Access

Cancel

User Information



On the following screen, you will need to provide your user and organization information. For the “Part 1: User Information” section you will need to enter a User ID, personal information, a password, and security questions. Make note of this information, as it will be used to access eDisclosure. On-screen messages will be displayed if you do not meet the User ID and password requirements.

Please fill out all required fields marked with an asterisk(*)

Part 1: User Information

The program you are registering for requires additional proof of identity. Later in the registration process you will be given the option to use LexisNexis, an identity proofing service. LexisNexis will pull your first, middle and last name exactly as it is entered on this page.

User ID *	<input type="text"/>
Title *	<input type="text" value="Mr"/>
First Name *	<input type="text"/>
Middle Initial	<input type="text"/>
Last Name *	<input type="text"/>
Suffix	<input type="text" value="-Please Select-"/>
Password *	<input type="password"/>
Re-type Password *	<input type="password"/>
Security Question 1 *	<input type="text" value="-Please Select-"/>
Security Answer 1 *	<input type="text"/>
Security Question 2 *	<input type="text" value="-Please Select-"/>
Security Answer 2 *	<input type="text"/>
Security Question 3 *	<input type="text" value="-Please Select-"/>
Security Answer 3 *	<input type="text"/>

Organization Information



In “Part 2: Organization Info”, you will need to select an organization. Note that you should select the organization on whose behalf you are disclosing. The organization may or may not be the same organization you are employed by (Figure 1-6). Enter the organization name and click on the “Search” button. A list of organization names will display for you to select from. If you can’t find the organization you are searching for, you will be given the option to submit a request to add a new organization.

Part 2: Organization Info

Search for your organization using the text box below. You may search by entering the Organization Name or the Organization ID.


Select the organization you are disclosing a violation on behalf of. The organization may or may not be the same organization you are employed by (i.e. if you are legal representation).

Search

CDX Confirmation



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 **Confirmation** [Contact Us](#)

1. Program Service ✓

2. Role Access ✓

3. User and Organization ✓

4. Confirmation

A few more steps...

You will soon receive an email confirmation message (at paulette.elvir@cgifederal.com) asking you to follow a link to activate your user account. Follow that link to complete your registration. Please contact the help desk if you have any issues at 888-890-1995 or (970) 494-5500 for International callers.

Confirmation Number: **cd885923-e34c-4233-8699-de9ac5f60565**

[Return to CDX Home](#)

You will be sent an email with a link and are requested to log-in.

CDX Registration – Additional Verification



Home About Recent Announcements Terms and Conditions FAQ Help

CDX CDX Registration: Additional Verification [Contact Us](#)
Logged in as TESTABCD [\(Log out\)](#)

1. Identity Verification > 2. Electronic Signature Agreement

The program you are registering for requires additional proof of identity. Your options are to use LexisNexis®, an independent 3rd-Party electronic identity proofing service or to print and submit a signed form through U.S. Postal Mail to the U.S. Environmental Protection Agency.

Note: By clicking [Proceed to Verification] you understand the service is voluntary and that you are validating personally identifying information including the last 4 digits of SSN against a 3rd-Party service LexisNexis®, which will return evidence of validation of your personally identifying information back to the U.S. Environmental Protection Agency. The U.S. EPA will not collect or retain sensitive, personally identifying information such as your Social Security Number (SSN); however, EPA will receive evidence of identity validation which may be used to identify you for legal purposes.

You may [sign the paper form](#) if you do not want to use the automatic verification process.

Note: You will receive a limited number of attempts to complete identity verification. Please review all personal information carefully prior to submitting. If you need to modify the personal information listed below, please contact the [CDX Help Desk](#).

First Name: Paulette
Last Name: Elvir

☐ I have reviewed the name presented above and I would like to proceed with LexisNexis. [Additional LexisNexis Identity Proofing Guidance](#)

[Exit](#)


[Proceed to Verification](#) [Cancel](#)

You will be asked to provide proof of identity either via paper or electronically.

CDX Registration – Challenge Questions



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 **Central Data Exchange**

[Contact Us](#)
Logged in as TESTABCD ([Log out](#))

CDX Registration: Additional Verification

1. Identity Verification ✓

2. Electronic Signature Agreement

You are registered for a program that requires eSignature PIN Verification. Please select five (5) challenge questions and answers. The questions that you select should be questions that you can remember, but difficult for anyone else to guess.

Select 5 Challenge Questions and Answers

<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Save Answers

CDX Registration – Electronic Signature Agreement Page



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CDX Registration: Additional Verification [Contact Us](#)
Logged in as TESTERDISC1 ([Log out](#))

1. Identity Verification✓

2. Electronic Signature Agreement

Electronic CDX Electronic Signature Agreement

The CDX electronic signature agreement (ESA) is an agreement between yourself and CDX that will authorize your electronic signature. By signing the ESA you agree to adhere to the conditions listed on the agreement below. Once the ESA has been signed, you will be authorized to sign and/or encrypt information for your data flow. For any questions regarding the CDX ESA please contact the [CDX Help Desk](#).

U.S. Environmental Protection Agency ELECTRONIC SIGNATURE AGREEMENT

In accepting the electronic signature credential issued by the U.S. Environmental Protection Agency (EPA) to sign electronic documents submitted to EPA's Central Data Exchange (CDX), and as a representative for:

Electronic Signature Holder Company Information

Organization Name:	ABC
Address:	123 MAIN ST
City, State, Zip:	FAIRFAX, VA 22030
Province:	
Country:	US
Phone Number:	(703) 888-9996
E-mail Address:	paulette.elvir@cgifederal.com
Registrant's Name:	Mrs Paulette Elvir
CDX User Name:	TESTERDISC1

[Sign Electronically](#) [Cancel](#)

CDX Registration – Certification Statement



1. Identity Verification ✓ 2. Electronic Signature Agreement

Electronic CDX Electronic Signature Agreement

The CDX electronic signature agreement (ESA) is an agreement between yourself and CDX that will authorize your electronic signature. By signing the ESA you agree to adhere to the conditions listed on the agreement below. Once the ESA has been signed, you will be authorized to sign and/or encrypt information for your data flow. For any questions regarding the CDX ESA please contact the [CDX Help Desk](#).

U.S. Environmental Protection Agency ELECTRONIC SIGNATURE AGREEMENT

In accepting the electronic signature credential issued by the U.S. Environmental Protection Agency (EPA) to sign electronic documents submitted to EPA's Central Data Exchange (CDX), you agree to the following terms and conditions:

Electronic Signature Holder Certification

Organization Name:
Address:
City, State, Zip:
Province:
Country:
Phone Number:
E-mail Address:
Registrant's Name:
CDX User Name:

I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.


CDX Registration – Signature Ceremony

The screenshot shows the EPA's CDX Registration portal. At the top, the EPA logo and navigation links (Home, About, Recent Announcements, Terms and Conditions, FAQ, Help) are visible. The main heading is "CDX Registration: Additional Verification". Below this, a progress bar indicates "1. Identity Verification" is complete and "2. Electronic Signature Agreement" is the current step. The page title is "Electronic CDX Electronic Signature Agreement". A modal window titled "eSignature Widget" is open, containing three sections: "1. Log in to CDX" with fields for User (EDISCLOSURE2015) and Password (masked), a "Welcome karmen duran" message, and a "Sign" button; "2. Answer Secret Question" with a question "Where did you graduate from high school?", an answer field containing "school", and a "Correct Answer" confirmation; and "3. Sign File". Below the modal, there are three numbered steps: (12) Agree to retain a copy of this signed agreement...; (13) Certify I have the authority to enter into this Agreement...; and (14) Certify that by signing and submitting this agreement... At the bottom of the page are "Sign Electronically" and "Cancel" buttons.


At this point, your registration is complete. You will be taken to your MyCDX page where you will see the eDisclosure Program Service and role. You may now access your Disclose/Certify role by clicking on the hyperlink on your MyCDX page


My CDX Page





 **EPA** United States Environmental Protection Agency

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 **Central Data Exchange**

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Logged in as TESTERDISC1 ([Log out](#))

MyCDXInboxMy ProfileSubmission History

Services			 Manage
Status	Program Service Name	Role	
	eDisclosure: Voluntary Disclosure System	Disclose/Certify	

CDX Service Availability

[See the status for all program services](#)

News and Updates

No news/updates.

[Add Program Service](#) [Manage Your Program Services](#)

eDisclosure Landing Page – Warnings



[MyCDX](#) [Inbox](#) [My Profile](#)

You are here: [MyCDX](#) » Warning Notice and User Agreement

WARNING NOTICE AND USER AGREEMENT

In proceeding and accessing this U.S. Government eDisclosure system, you acknowledge that you fully understand and consent to all of the following:

1. This system allows regulated entities to disclose potential civil (but not criminal) violations of federal environmental laws, regulations, and requirements, and may result in the issuance of an electronic Notice of Determination (eNOD) or Acknowledgement Letter (AL) pursuant to EPA's Audit Policy or Small Business Compliance Policy.
2. Any information entered onto this electronic system is voluntarily submitted and automatically becomes part of an enforcement investigation case file.
3. All information submitted must be truthful under penalty of law, and all such information will be retained by EPA and potentially could be publicly disclosed in response to requests under the Freedom of Information Act (FOIA) or for other lawful government purposes.
4. You are not submitting any confidential business information (CBI). EPA will consider any CBI claims to be waived if such information is uploaded onto this system.
5. You are not submitting other private information the disclosure of which would constitute an unwarranted invasion of any person's privacy (e.g., social security numbers, birth dates, medical records, personal financial information, or other private information).
6. If your disclosure requires the submission of such private or confidential business information, you must contact the eDisclosure [Help Desk](#) to arrange for secure transmittal of any necessary and appropriate information.


If you would like to view a short video describing how the eDisclosure system works, please click [here](#).

☐ By checking on this box, I acknowledge that I am disclosing for the following organization: **US EPA**. If you do not want to disclose on behalf of **US EPA**, [click here](#).

[Proceed](#) | [Exit](#)

eDisclosure Landing Page – Violation Disclosure






[Contact Us](#)
Logged in as TESTERABC ([Log out](#))

[MyCDX](#) [Inbox](#) [My Profile](#) **[Violation Disclosure](#)** [Compliance Certification](#) [Disclosure Search](#) [Sharing](#) [Manage Facilities](#)

You are here: [MyCDX](#) » Open and Closed Disclosures

This page is where you can enter information about potential civil (but not criminal) violations of environmental law that you wish to voluntarily disclose to EPA and to view a listing of your open and closed disclosures. For more information about, or to edit, a disclosure, click on the Details hyper-link in the Available Actions column.

[Disclose New Violations](#) 

The Open Disclosures table below shows all of your open disclosures. Once Compliance Certifications are submitted for all violations in a Disclosure Group, it will no longer display in the Open Disclosures table. To view the details of any such closed disclosures, please see the Closed Disclosures table below or click [here](#) to do a search of your Closed Disclosures. If you also wish to view disclosures that others have shared with you, please click on the Sharing tab at the top of the page.

Open Disclosures

[Expand all](#) [Collapse all](#)

Disclosure Name	Disclosure Initiation Date	Status	Available Actions
▶ Test ABC	12/07/15	In Progress - Disclosure(s) & Compliance Certification(s) Pending	Details

The table below shows all of your closed disclosures.

Closed Disclosures

[Expand all](#) [Collapse all](#)

Disclosure Name	Disclosure Initiation Date	Status	Available Actions
No Disclosures Found			