

CROMERR-General Overview

CROMERR is an acronym for the phrase “Cross Media Electronic Reporting Rule,” a rule adopted by the EPA in 2005. This rule was designed to ensure that all documents for delegated programs that are submitted electronically are legally binding and useable in court. CROMERR specifies complex requirements for agencies that operate delegated programs, requiring that any electronic documents accepted by those agencies must comply with stringent new guidelines. Once a system is put in place that satisfies the requirements of CROMERR, regulated facilities can file electronic reports instead of paper reports, reducing the amount of paper created and transferred, and thereby reducing the cost of reporting and compliance monitoring for both the facilities and the agency operating the delegated program. CROMERR defines a framework for the acceptance of electronic reports from regulated entities in satisfaction of certain document submission requirements in EPA’s regulations. The rule does not mandate that regulated entities utilize electronic methods to submit documents in lieu of paper-based submissions, but it does provide the specification for a mechanism for them to do so.

Instead of using an ad hoc, program by program approach to CROMERR compliance, Oklahoma DEQ has designed and implemented a single approach to document submission that applies to all documents submitted. Under DEQ’s approach, compliance with the requirements of CROMERR becomes a single, unified, and consistent effort; independent of the various programs and their supportive software applications. This approach provides a number of advantages, including lower cost, faster implementation, and a single compliance infrastructure to understand, support, and maintain.

The single umbrella approach is made possible through a web portal named Electronic Reporting System (ERS) which all of DEQ’s current and future programs that are subject to CROMERR will talk to. All applications that are/will accept data from regulated entities will hand the data to ERS which in turn makes call to EPA’s Shared CROMERR Services to handle the CROMERR compliancy issue. Basically, ERS will generate a document representing the submission, which the representatives of the regulated entities (referred to as signatories) will have to review, sign, and submit through ERS portal. The Identity Proofing of the signatory, the signature ceremony and storing the Copy of Record are all accomplished by invoking the Shared CROMERR Services.

Definitions

Electronic Signature Agreement: *Electronic signature agreement* means a web based agreement attested to by an individual with respect to device that the individual will use to create his or her electronic signature.

Electronic Signature: *Electronic signature* means any information in digital form attached to or logically associated with a record submitted to the DEQ's electronic document receiving system and executed or adopted by a person with the intent of expressing the same meaning as would a handwritten signature if affixed to an equivalent paper document with the same content.

Digital Signature Certificate: A digital certificate is issued by and contains the digital signature of the certificate-issuing authority so that anyone can verify that the certificate is real. A certificate is issued to and used by the signer to apply digital signature on an electronic document which authenticates the identity of the signer and provides the integrity of the document.

Signatory: means an individual authorized to and who signs a document submitted to the DEQ's electronic document receiving system pursuant to an electronic signature agreement in a format acceptable to the DEQ.

Section 1

How to submit a report under CROMERR rules

Step 1 and 2 need to be done if:

- 1) You are creating a new signatory account;
- 2) The signatory ceases to be the authorized person or the signatory has quit, resigned, or been fired from employ and he/she is being replaced;
- 3) The credential has been compromised (or suspected to have been compromised);

Step 1: Register for a Certificate and Account.

Steps 1, 2 and 3 needs to be completed by a company representative known as the “signatory” who is authorized by the company official to submit data/documents to the Oklahoma DEQ on their behalf. For someone who is signing up for the DMR program, this must be a person that has experience with all the goings-on of the wastewater facility (ie: a Wastewater Operator, Mayor, Wastewater Plant Superintendent, Wastewater Manager, etc...)

- a) Go to Oklahoma DEQ website (<http://www.deq.state.ok.us>) and click on Oklahoma CROMERR Information and then the link to Electronic Reporting System.

b) Click on Register on the left pane.

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Welcome to the Oklahoma DEQ Electronic Reporting System.

CROMERR, an acronym for the phrase "Cross Media Electronic Reporting Rule," was adopted by the US Environmental Protection Agency (EPA) in 2005, for the purpose of providing a unified legal framework for electronic reporting under all of EPA's environmental regulations. CROMERR specifies the requirements for states, tribes and local governments that operated delegated programs to accept electronic reporting, including electronic signatures, from regulated facilities under most environmental regulations. Once a system is put in place that satisfies the requirements of CROMERR, regulated facilities can file electronic reports instead of paper reports, reducing the amount of paper created and transferred, and thereby reducing the cost of reporting and compliance monitoring for both the facilities and the agency operating the delegated program. CROMERR was in part issued to comply with the Government Paperwork Elimination Act of 1998, an act that requires agencies to provide an electronic reporting option for regulated facilities.

In many cases, it is likely that many organizations that come under the requirements of CROMERR will propose and implement vertical, application and/or program specific architectures to comply with CROMERR requirements. Oklahoma's solution to CROMERR demonstrates a different approach—a unified approach that encompasses all applications and programs within an entity that is operating delegated programs. Under this approach, the compliance with the requirements of CROMERR becomes a single, unified, and consist effort, independent of the various programs and their supportive software applications. This approach provides a number of advantages, including lower cost, faster implementation, and a single compliance infrastructure to understand, support, and maintain.

Oklahoma's CROMERR Solution implements [Shared CROMERR Services](#) for Identity Proofing, User Management, Sign and Store Documents.

c) Fill out all the information requested in each page, read the agreement at the last page, check the box "I Accept" and click the button "Submit".

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Registration

Agreement and Attestation

- I Understand that this Electronic Signature Agreement allows me to submit electronic documents to the Oklahoma Department of Environmental Quality's ("DEQ") approved electronic document receiving system ("EDRS") under authorized programs in lieu of paper submissions.
- I Understand that the DEQ has adopted applicable rules at Oklahoma Administrative Code 252.4-17, entitled "Electronic Reporting"
- I Agree to protect my unique electronic signature device from compromise and from use by anyone except me. Specifically, I agree to maintain the secrecy of the password. I will not divulge or delegate my user name and password to any other individual. I will not store my password in an unprotected location; and I will not allow my password to be written into computer scripts to achieve automated log-in.
- I Agree to contact the DEQ EDRS administrator at deqreporting@deq.ok.gov as soon as possible, but no later than 24 hours, after suspecting or determining that my user name and/or password have become lost, stolen or otherwise compromised.
- I Agree that I will review the contents of all electronic submissions prior to submission.
- I Understand and agree that I will be legally bound, obligated, or responsible by my use of my electronic signature as I would be using my hand-written signature.
- I Understand that I will automatically receive an e-mail receipt from the DEQ's EDRS for any submission that contains a valid electronic signature, identifying the document received, the signatory, and the date and time of receipt.
- I Agree that I will contact the DEQ EDRS Administrator if I do not receive an e-mail receipt as specified above within five (5) business days for any submission to the DEQ's EDRS.
- I Understand that I will have the opportunity to review the document submitted in a human-readable format and an opportunity to repudiate the electronic document based on this review.
- I Understand that the DEQ's EDRS will automatically reject any electronic document submitted without a valid electronic signature if such signature is required.
- I understand that the DEQ may contact my immediate supervisor or company official to verify my identity and/or authority to electronically submit documents for the regulated entity.
- I Agree to notify the DEQ EDRS Administrator if I cease to represent the regulated entity specified above as signatory as soon as this change in relationship occurs.
- I Agree to retain a copy of this signed agreement as long as I continue to represent the regulated entity specified above as signatory of the company's electronic submissions.

☒ **I Accept.**
Submit

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- d) This will take you to the screen below to review Electronic Signature Agreement document (ESA).

The screenshot shows the Oklahoma Department of Environmental Quality (DEQ) website. The header includes the DEQ logo, the text 'Oklahoma Department of Environmental Quality', and navigation links for 'RULES & REGULATIONS', 'PUBLICATIONS & FORMS', and 'PROGRAMS'. A secondary navigation bar lists 'air quality * water quality * land protection * customer services * environmental complaints & local services'. On the left, a sidebar contains links: 'Home', 'Signup', 'Signup Almost Complete', 'Log In', 'Register', 'Forgot Password', 'Forgot Answers', 'Contact Us', and 'Help'. The main content area is titled 'You're Almost Done...' and contains a paragraph explaining the final step of the ESA process. At the bottom, there are two buttons: 'View Signature Agreement' and 'Sign Signature Agreement'.

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You're Almost Done...

But there is still one step to complete. Oklahoma regulations require that you view, sign, and submit the Electronic Signature Agreement form to the Oklahoma Department of Environmental Quality. This can be accomplished by clicking the view button to download the ESA and verify everything is correct, then clicking the sign and submit button. The information submitted in previous steps will be used to apply your digital signature to the document before submission. Once the document is submitted successfully your account will be activated and ready for use.

[View Signature Agreement](#) [Sign Signature Agreement](#)

Click View ESA and open the document, review the content and then click Sign and Submit to submit the ESA.

Step 2: Log on to ERS

Once you Sign and Submit ESA, you will get an email with your username. Your password is the same as that you entered during registration.

- a) Click on Log In link on the left pane.

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Oklahoma's CROMERR Solution implements [Shared CROMERR Services](#) for Identity Proofing, User Management, Sign and Store Documents.


- b) Carefully read the Attestation Warning on top of the page then check “I Accept” box and provide your username and password. Your username is not case sensitive but our password IS. Click on the log in button to sign in.

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ATTESTATION WARNING

This Electronic Reporting System (“ERS”) has been established by the Oklahoma DEQ for the use of businesses or entities required to file reports or other data pursuant to federal and state laws and regulations. By affixing my electronic signature to this document and by choosing to submit this document through the DEQ’s ERS, I certify, acknowledge, and/or agree as follows:

- That I am the duly authorized representative of the business or entity associated with the electronic signature credential assigned to me by the Oklahoma DEQ and that I am uniquely entitled to use the signature device;
- That the data I am submitting is true and correct to the best of my knowledge;
- That I may be subject to civil or administrative enforcement and penalties for failure to comply with reporting requirements under regulatory programs applicable to the business or entity I represent;
- That I may be subject to criminal liability for false certification of the data submitted; and
- That I am free to discontinue this transaction at this time; otherwise, the document will be submitted to the DEQ and the transaction will be complete, subject to my opportunity to repudiate the document as submitted in a human-readable format.

☒ I Accept

Username

Mickey.Mouse

Password

Log In

- c) You will be asked to answer one of the questions that you provided answers for during the registration process. Type the answer (not case sensitive) and click Submit.

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You must provide answer to the following question to complete your authentication to the portal.

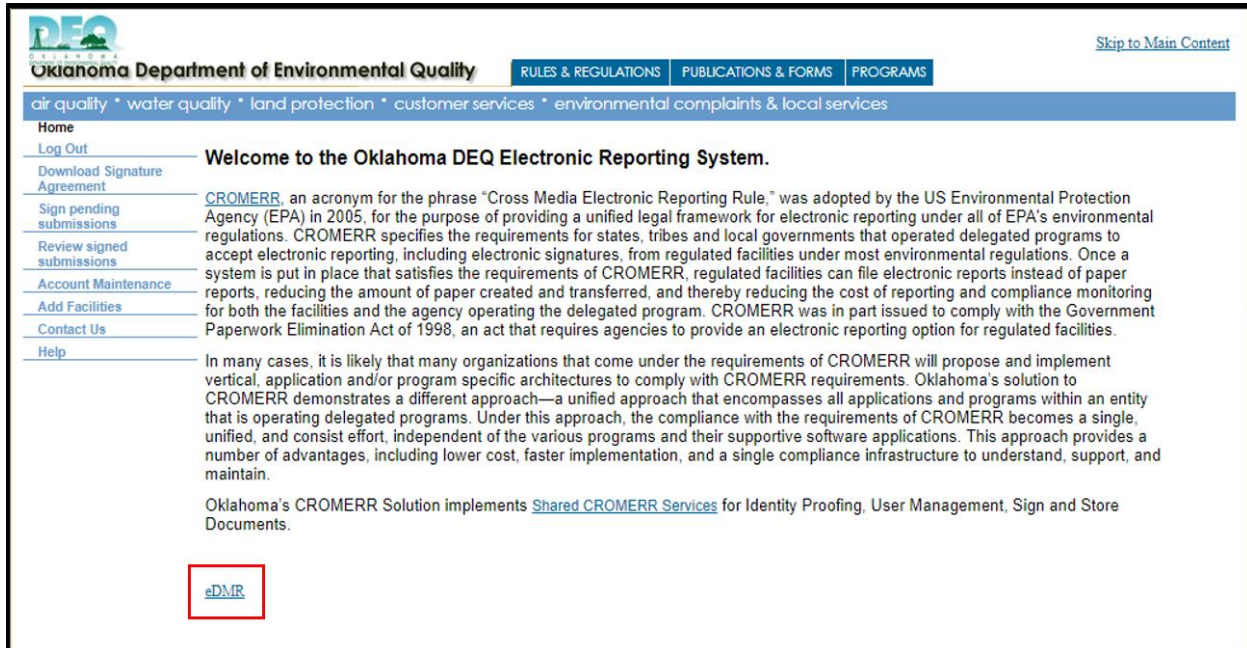
What is your best friend's last name?

Note: Providing wrong answer will give you two more chances to answer it correctly. If you fail three times you will be notified that you reached max number of answer attempts. You can click on [Forgot Answers](#) on the left pane to reset your questions and/or answers to fix the problem.

- d) If you have provided the right password and answer to the question you will now be logged in.

Step 3: Review or Submit Data

- a) Once you are successfully logged on to ERS, you can submit data through the link(s) that are provided if you are authorized to submit data for that program. The link will take you to the respective application to submit data.



The screenshot displays the Oklahoma Department of Environmental Quality (DEQ) Electronic Reporting System (ERS) homepage. At the top left is the DEQ logo. To its right is the text "Oklahoma Department of Environmental Quality". Further right are three navigation tabs: "RULES & REGULATIONS", "PUBLICATIONS & FORMS", and "PROGRAMS". Below these tabs is a blue horizontal bar containing the text "air quality * water quality * land protection * customer services * environmental complaints & local services". On the left side of the page is a vertical menu with links: "Home", "Log Out", "Download Signature Agreement", "Sign pending submissions", "Review signed submissions", "Account Maintenance", "Add Facilities", "Contact Us", and "Help". The main content area begins with the heading "Welcome to the Oklahoma DEQ Electronic Reporting System." followed by a paragraph explaining CROMERR (Cross Media Electronic Reporting Rule), its adoption by the EPA in 2005, and its purpose. Below this is another paragraph discussing the benefits of CROMERR for regulated facilities. At the bottom of the main content area, it states that Oklahoma's CROMERR Solution implements "Shared CROMERR Services" for Identity Proofing, User Management, Sign and Store Documents. A red rectangular box highlights the "eDMR" link located at the bottom left of the page.

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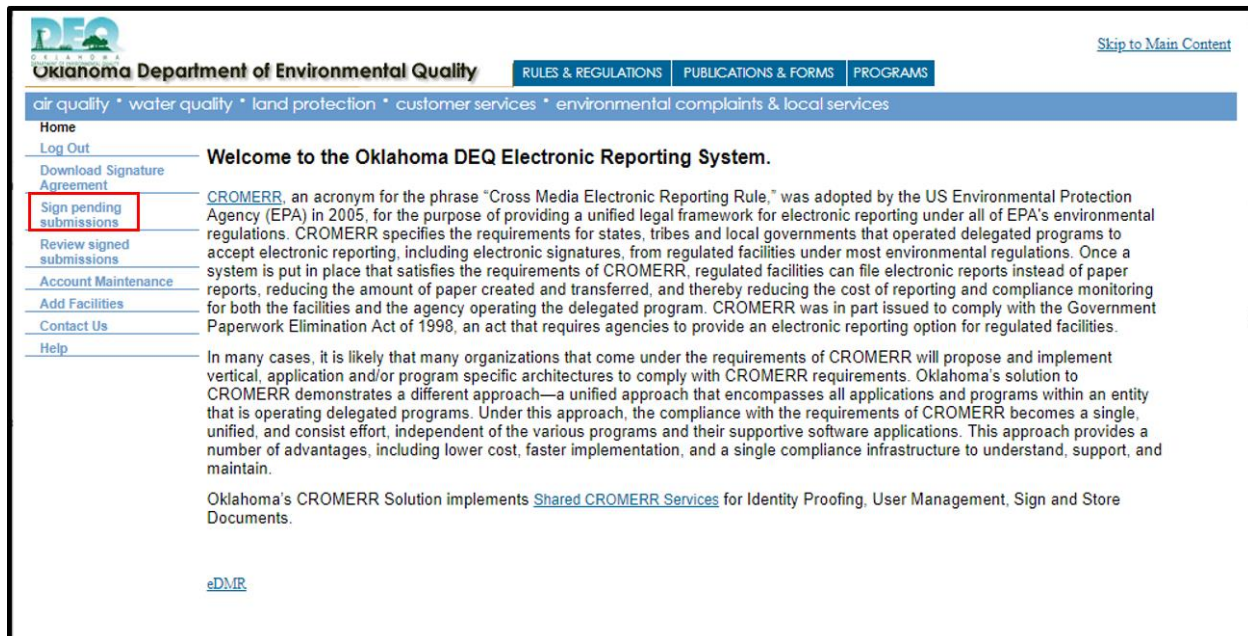
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[eDMR](#)

- b) Once you have submitted your document through the other service (ie: E2, Lab to State (PWS), etc...), you will be able to view and sign those by clicking Sign pending submissions on the left pane.

Step 4: Sign Documents

- a) Click on Sign Pending Submissions. If there are submissions pending for signature, you should be able to see the list.



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Welcome to the Oklahoma DEQ Electronic Reporting System.

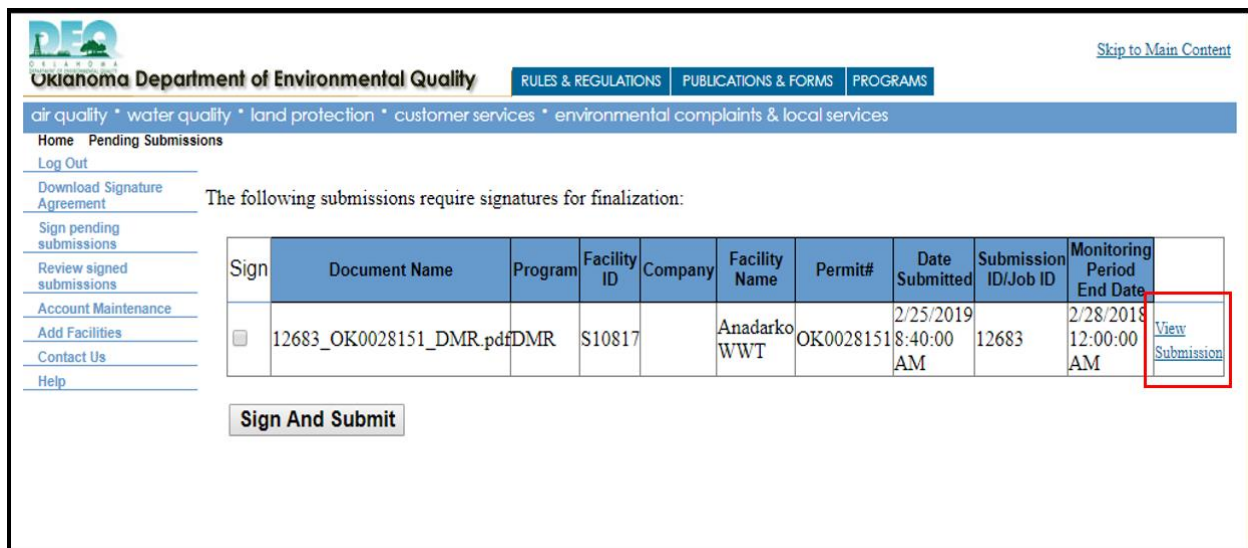
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- b) Click on View Submission to download a copy of the submission and to review it.



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The following submissions require signatures for finalization:

Sign	Document Name	Program	Facility ID	Company	Facility Name	Permit#	Date Submitted	Submission ID/Job ID	Monitoring Period End Date	
<input type="checkbox"/>	12683_OK0028151_DMR.pdf	DMR	S10817		Anadarko WWT	OK0028151	2/25/2019 8:40:00 AM	12683	2/28/2018 12:00:00 AM	View Submission

Sign And Submit

- c) Once your review is done, and you are satisfied with the eDMR, you can go back to Sign pending submissions page to sign the document(s). Check the one(s) you would like to sign and click Sign and Submit.

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Sign	Document Name	Program	Facility ID	Company	Facility Name	Permit#	Date Submitted	Submission ID/Job ID	Monitoring Period End Date	
<input checked="" type="checkbox"/>	12683_OK0028151_DMR.pdf	DMR	S10817		Anadarko WWT	OK0028151	2/25/2019 8:40:00 AM	12683	2/28/2018 12:00:00 AM	View Submission

Sign And Submit

- d) This will bring up an Attestation Warning page. Read it carefully and enter your password and the answer to the security question then click Accept and Sign.

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- That I am the duly authorized representative of the business or entity associated with the electronic signature credential assigned to me by the Oklahoma DEQ and that I am uniquely entitled to use the signature device;
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- That I may be subject to civil or administrative enforcement and penalties for failure to comply with reporting requirements under regulatory programs applicable to the business or entity I represent;
- That I may be subject to criminal liability for false certification of the data submitted; and
- That I am free to discontinue this transaction at this time; otherwise, the document will be submitted to the DEQ and the transaction will be complete, subject to my opportunity to repudiate the document as submitted in a human-readable format.


Enter Password:

Security Question: What is your best friend's last name?

Answer:

Accept and Sign **Cancel**

- e) If it was submitted correctly, you will get a message on the screen that your document is signed and submitted as well as an email with a link to the document.

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Your submissions have been successfully signed and uploaded.



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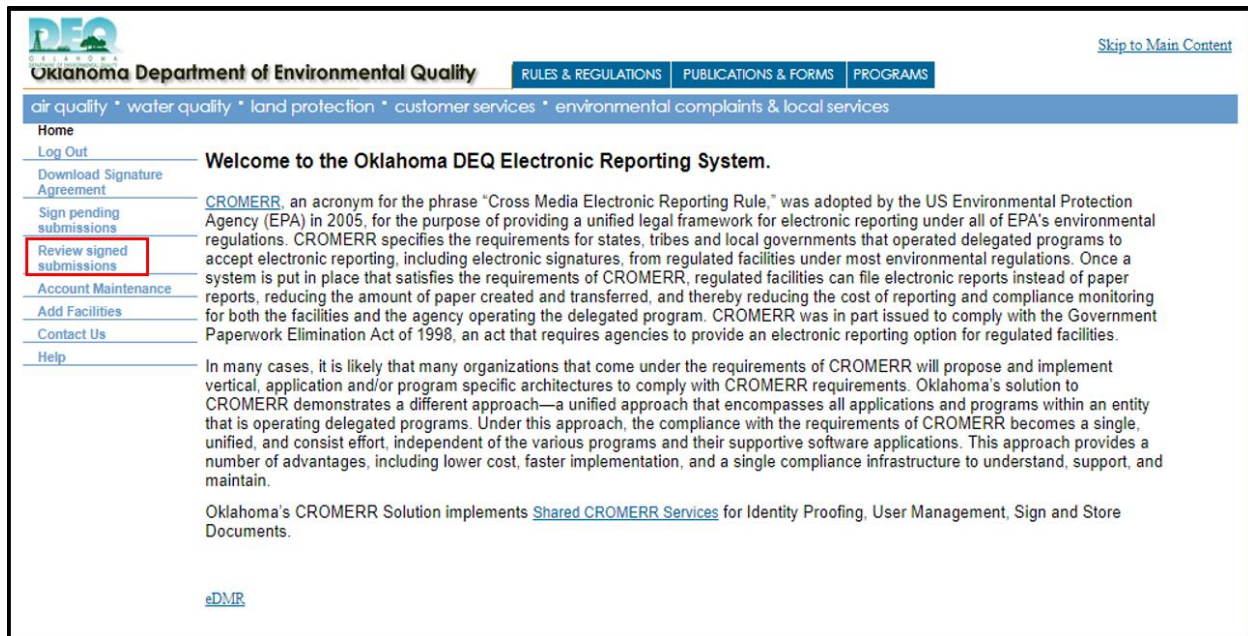
Enter Password:

Security Question: What is your best friend's last name?

Answer:

Step 5: Review Signed Documents

- a) You can review past submissions by clicking on [Review Signed Submissions](#)



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Welcome to the Oklahoma DEQ Electronic Reporting System.

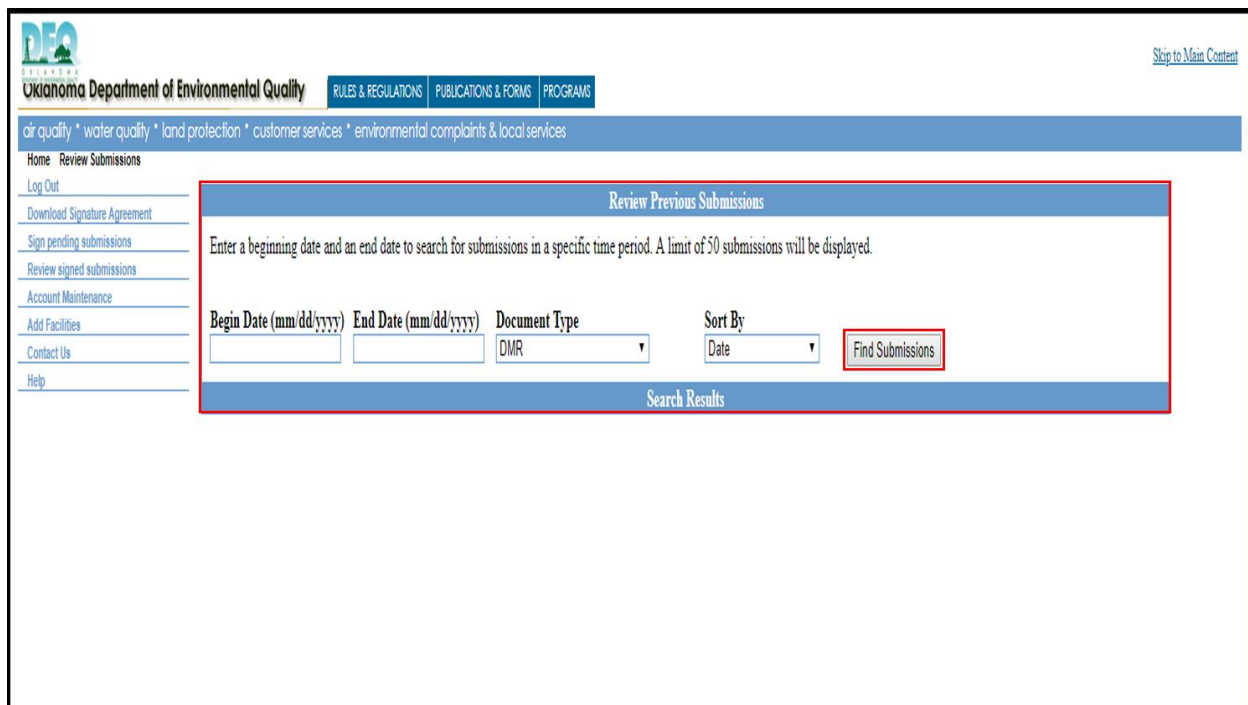
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- b) By default there will not be any submissions displayed. You will need to choose your search criteria in the "Review Previous Submissions" box. Then click [Find Submissions](#) to display your search results.



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Enter a beginning date and an end date to search for submissions in a specific time period. A limit of 50 submissions will be displayed.

Begin Date (mm/dd/yyyy) **End Date (mm/dd/yyyy)** **Document Type** **Sort By** **[Find Submissions](#)**

Search Results

- c) Clicking on View Submission next to the document you would like to view and download the document to view it.

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Document Name	Program	Facility Name	Date Submitted	Submission ID/Job ID	
12247_OK0022951_DMR.pdf	DMR	Jim E Hamilton Correctional Center WWT	2/20/2019 2:07:00 PM	12247	View Submission
15005_OK0021890_DMR.pdf	DMR	Depew WWT	2/20/2019 2:33:00 PM	15005	View Submission
12683_OK0028151_DMR.pdf	DMR	Anadarko WWT	2/25/2019 8:40:00 AM	12683	View Submission

Section 3

Managing your Account

Part 1: Changing password:


- a) Once you are logged on, you can change your password by clicking on Account Maintenance and then Change Password.



- b) You will need to provide your old and new password and submit the request. Your password will be changed provided it does not match one of your previous ten passwords. You will receive a message and an email notifying you of the change.

Part 2: Changing Security Questions and Answers:

- a) Once you are logged on, you can change security questions and answers. Click on [Account Maintenance](#) and then [Change Security Questions](#). You can pick new questions and answers here. Once you have completed the form, you will click submit and then you will receive a message and an email notifying you have the change.



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Change Security Questions and Answers

Knowledge Based Question #1	Answer to Question #1
<input type="text"/>	<input type="text"/>
Knowledge Based Question #2	Answer to Question #2
<input type="text"/>	<input type="text"/>
Knowledge Based Question#3	Answer to Question #3
<input type="text"/>	<input type="text"/>
Knowledge Based Question#4	Answer to Question #4
<input type="text"/>	<input type="text"/>
Knowledge Based Question#5	Answer to Question #5
<input type="text"/>	<input type="text"/>

Section 4

Forgot Password and/or Security Questions

Part 1: Forgot Password

- a) If you forgot your password, you can click on the Forgot Password link on the left.

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Welcome to the Oklahoma DEQ Electronic Reporting System.

CROMERR, an acronym for the phrase "Cross Media Electronic Reporting Rule," was adopted by the US Environmental Protection Agency (EPA) in 2005, for the purpose of providing a unified legal framework for electronic reporting under all of EPA's environmental regulations. CROMERR specifies the requirements for states, tribes and local governments that operated delegated programs to accept electronic reporting, including electronic signatures, from regulated facilities under most environmental regulations. Once a system is put in place that satisfies the requirements of CROMERR, regulated facilities can file electronic reports instead of paper reports, reducing the amount of paper created and transferred, and thereby reducing the cost of reporting and compliance monitoring for both the facilities and the agency operating the delegated program. CROMERR was in part issued to comply with the Government Paperwork Elimination Act of 1998, an act that requires agencies to provide an electronic reporting option for regulated facilities.

In many cases, it is likely that many organizations that come under the requirements of CROMERR will propose and implement vertical, application and/or program specific architectures to comply with CROMERR requirements. Oklahoma's solution to CROMERR demonstrates a different approach—a unified approach that encompasses all applications and programs within an entity that is operating delegated programs. Under this approach, the compliance with the requirements of CROMERR becomes a single, unified, and consist effort, independent of the various programs and their supportive software applications. This approach provides a number of advantages, including lower cost, faster implementation, and a single compliance infrastructure to understand, support, and maintain.

Oklahoma's CROMERR Solution implements [Shared CROMERR Services](#) for Identity Proofing, User Management, Sign and Store Documents.

- b) You will then enter your Username, then your answer to the Security Question, then enter your new password (following the password guidelines).

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Forgot Password

Use this form to reset a forgotten password. You will need to know your user id and answer a security question.
Enter your UserID to answer a security question and reset your password.

UserID

[Forgot your UserID?](#)

Security Question

You must answer the following security question in order to reset your password.

What is your best friend's last name?

Reset Password

Your new password must comply with our [password policy](#).

New Password

Confirm New Password

- c) Upon submission, your password will be changed and you will receive a message and an email notification.

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Forgot Password

Use this form to reset a forgotten password. You will need to know your user id and answer a security question. Enter your UserID to answer a security question and reset your password.

UserID

[Forgot your UserID?](#)

Security Question

You must answer the following security question in order to reset your password.

What is your favorite pet's name?

Reset Password

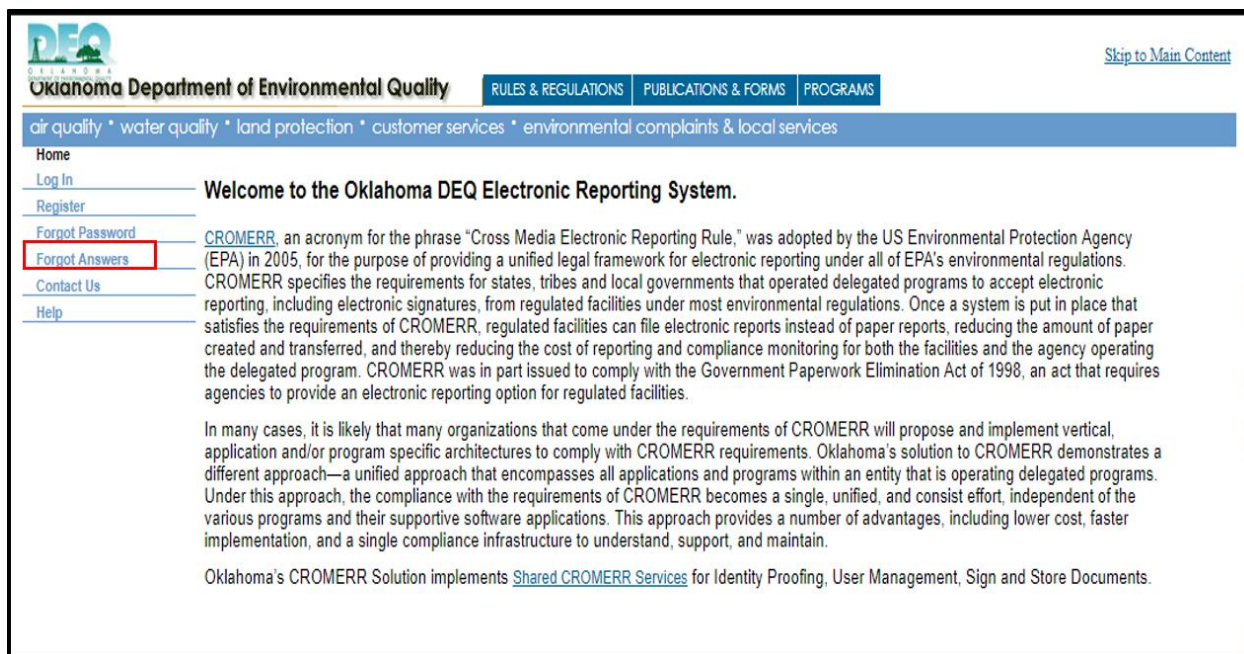
Your new password must comply with our [password policy](#).

New Password
Confirm New Password

- d) **Forgot User ID**
- When you click on [Forgot Password](#) link, you are asked for your User ID. If you have forgotten your User ID, there is a link right below the box that says [Forgot your UserID](#). Clicking that will require you to enter your email address. If you enter the right email address that you provided at the time of account request, your User ID will be emailed to you.

Part 3: Forgot Answers

- a) If you have forgotten your answers to the security questions, click on Forgot Answers.



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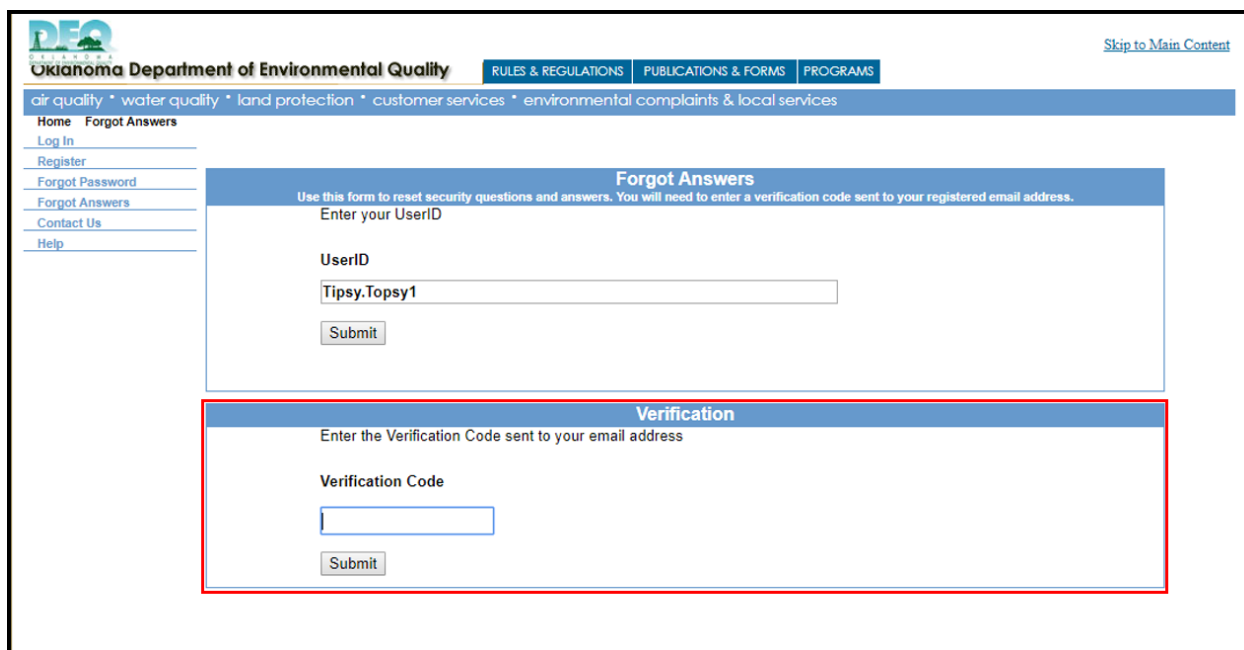
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Oklahoma's CROMERR Solution implements [Shared CROMERR Services](#) for Identity Proofing, User Management, Sign and Store Documents.

- b) Once you submitted your username, you will be emailed a verification code, which you will enter and submit.



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Forgot Answers

Use this form to reset security questions and answers. You will need to enter a verification code sent to your registered email address.

Enter your UserID

UserID

Verification

Enter the Verification Code sent to your email address

Verification Code

c) You will then change your security answers and questions, and his Submit.

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Change Security Questions and Answers

Knowledge Based Question #1
Where did you first meet your spouse? ▼

Answer to Question #1 **

Knowledge Based Question #2
What was your first pet's name? ▼

Answer to Question #2 **

Knowledge Based Question#3
Who is your favorite all-time entertainer? ▼

Answer to Question #3 **

Knowledge Based Question#4
Where did you graduate from high school? ▼

Answer to Question #4 **

Knowledge Based Question#5
What is your favorite pet's name? ▼

Answer to Question #5 **

Submit

d) When the new questions and answers are saved, you will receive and message and an email verify the changes.

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Change Security Questions and Answers

Your security questions and answers have been successfully changed.

Knowledge Based Question #1 ▼

Answer to Question #1 **

DEQ CROMERR Contacts

Personnel and Phone numbers:

Wastewater eDMRs: Paul Parks, (405) 702-8188

Stormwater eDMRs: Keri Jernigan, (405) 702-6206

PWS Lab to State: Erin Lovelady, (405) 702-8231

Email: degreporting@deq.ok.gov

Useful Links

EPA Cross-Media Electronic Reporting Regulation (CROMERR) website:

<http://www.epa.gov/cromerr/index.html>

CROMERR General Provisions and Requirements (Part 3, Title 40, Electronic Code of Federal Regulations)

http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl

Oklahoma CROMERR Portal (Electronic Reporting System):

A portal to accept electronic document submission under CROMERR Rules called Electronic Reporting System (ERS) runs on <http://www.deq.state.ok.us/ers>

Electronic Reporting System (ERS) Help:

Help with how to submit reports that require electronic signature through Oklahoma ERS can be found at <http://www.deq.state.ok.us/ERS/temp/cromerrhelp.pdf>