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 issue 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.

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".

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

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.

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.

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.

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.

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 see the list.

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

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.

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.

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.

Step 5: Review Signed Documents

a) You can review past submissions by clicking on Review Signed Submissions

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.

c) Clicking on <u>View Submission</u> next to the document you would like to view and download the document to view it.

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.

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.

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

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

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 <u>Forgot Answers.</u>

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

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

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

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: deqreporting@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