

# CROMERR: Following the Yellow Brick Road



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City of Grand Rapids WWTP

# The Journey



- Background of IU reporting
- Starting the CROMERR process
  - MDEQ
  - Ordinance/Publication
  - Linko Data Systems
  - Funding

# The Journey

- Application forms
- Submitting forms
  - Informal submissions to final submission
- EPA approval

# The Journey

- The road ahead
  - Linko Data Systems create e-reporting system
  - Report design and function
  - Staged rollout of features
  - Final thoughts

# Background



- 84 Permitted IU's
  - 37 Categorical IU's
  - 25 Surcharge IU's
  - 11 Local limits IU's
  - 8 photo processing IU's
  - 3 Groundwater remediation IU's

# Background

- Reports
  - Approx. 960 reports/yr.



- Approx. 480 hours of data entry/review.

# Background



- Fax machines
  - Outdated and unreliable
  - New companies do not buy fax machines
- Emails
  - Cannot be used to accept reports unless CROMERR approved system is in place.

# Starting CROMERR Process



Here we go!

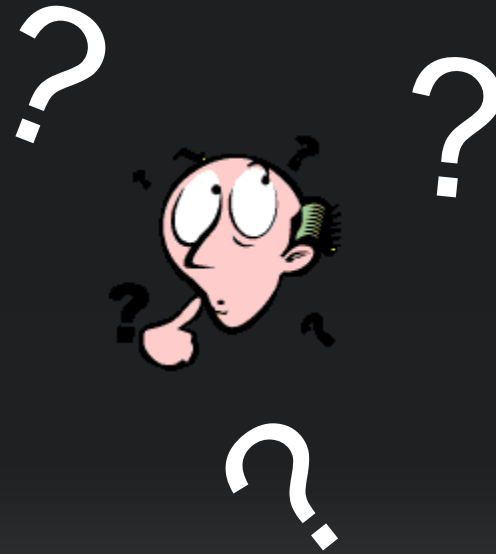


# CROMERR

- Cross Media Electronic Reporting Regulation
- Final rule published Oct. 2005

# Starting CROMERR Process

- Discussions with Linko Data Systems
  - Funding?
  - Is it possible?
  - Is it marketable?
  - Timetables?
  - Grants?



Many roads to follow....



# Starting CROMERR Process



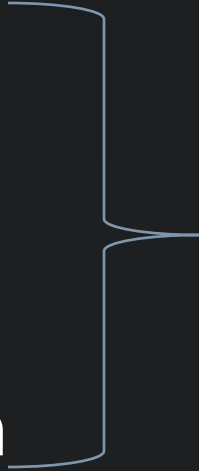
- Discussions with MDEQ
  - Ordinance changes
    - CROMERR definition
    - Language to accept reports electronically
  - Public notice requirements

# Application forms

- Application cover sheets

- System Checklist

- Legal Authority Certification



Application components

- Electronic signature agreement

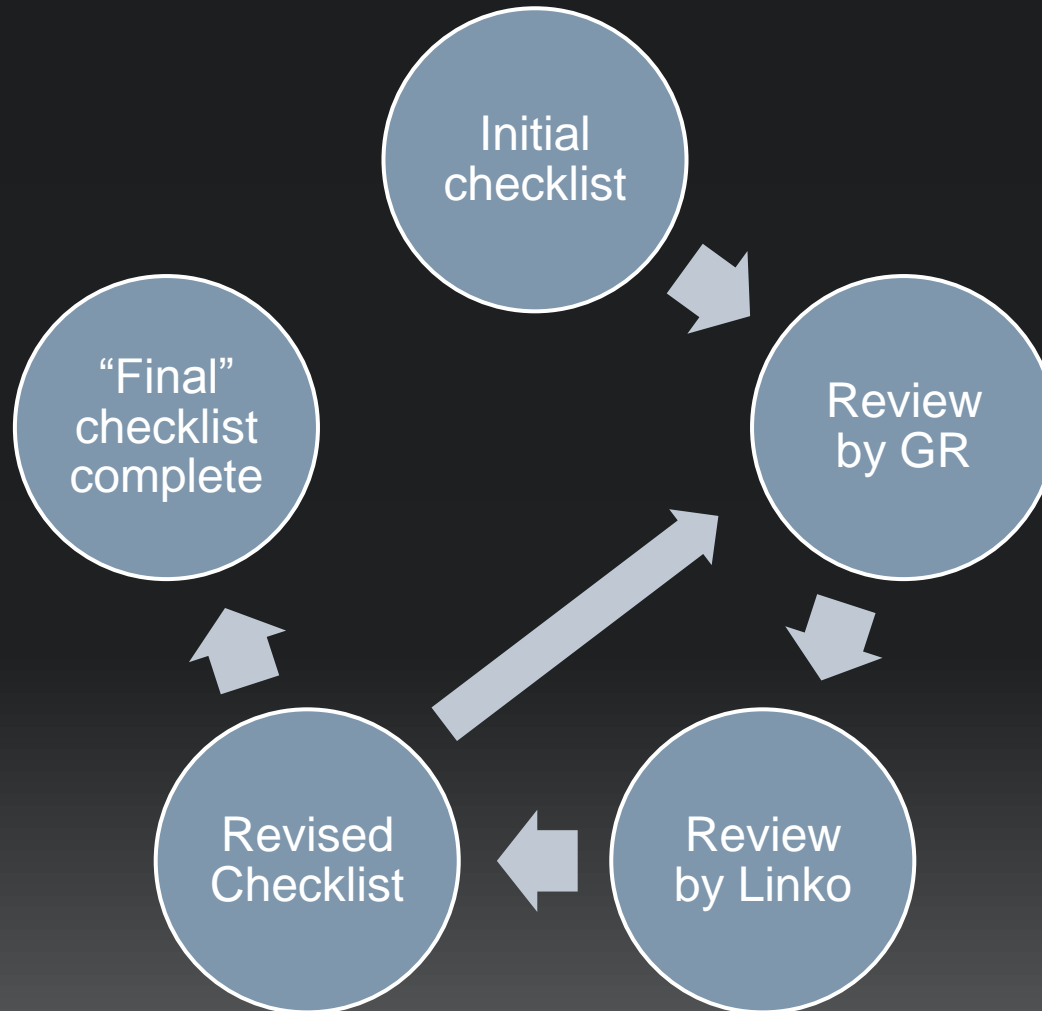
- Registration process, signature process, submission process

# Application forms



- Working with Linko Data Systems
  - Integrate business practices with system practices
    - Many revisions of checklist
  - Multiple meetings
    - Examples of reports pdfs

# Application forms



The road becomes challenging...





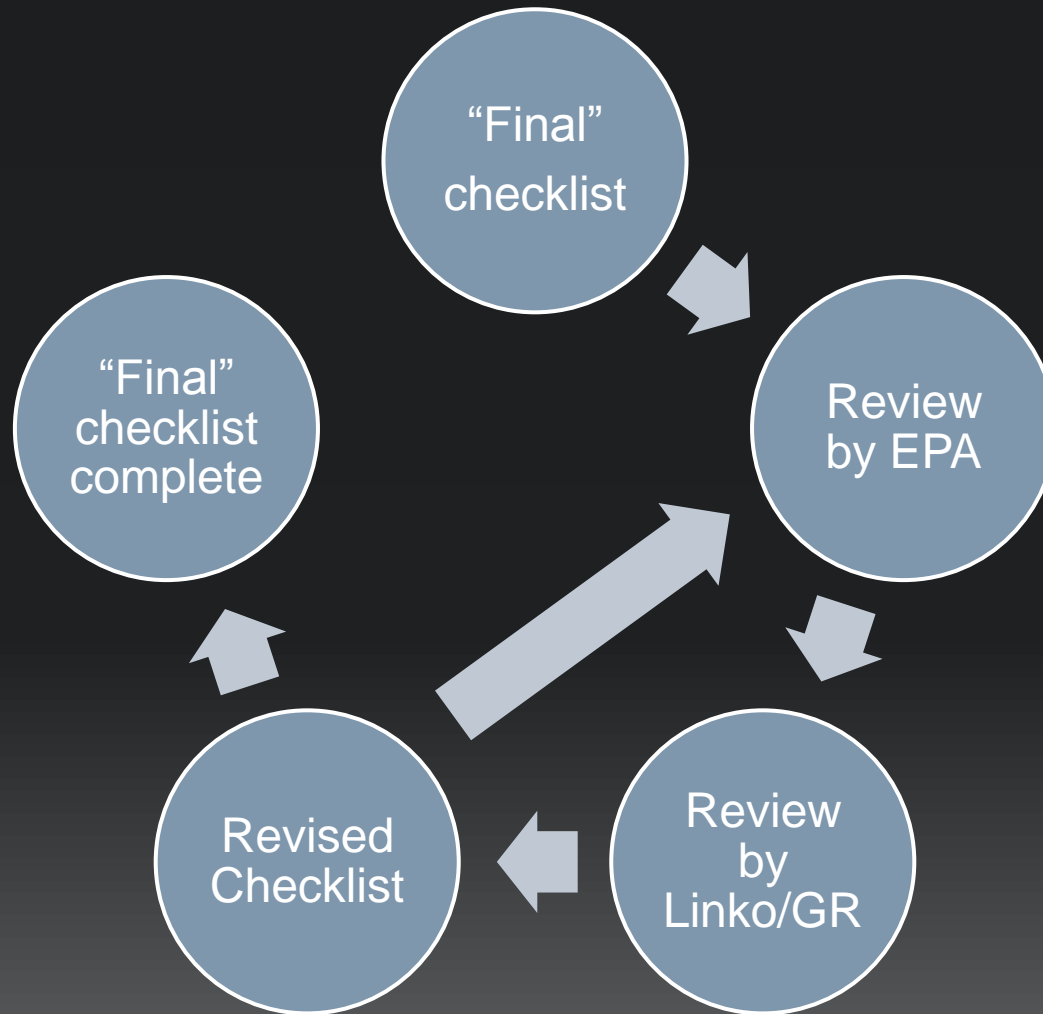
# Application forms

- Working with EPA
  - Multiple EPA contacts
  - Informal submissions
  - Meeting at EPA
  - EPA IT contractors

# Submitting forms

- Informal submissions
  - Feedback for smoother approval
  - Avoid a rejected application
  - Agreeing upon common language and system processes
  - IT contractor review of system processes for each checklist item
  - Keep track of submissions
  - Final submission!

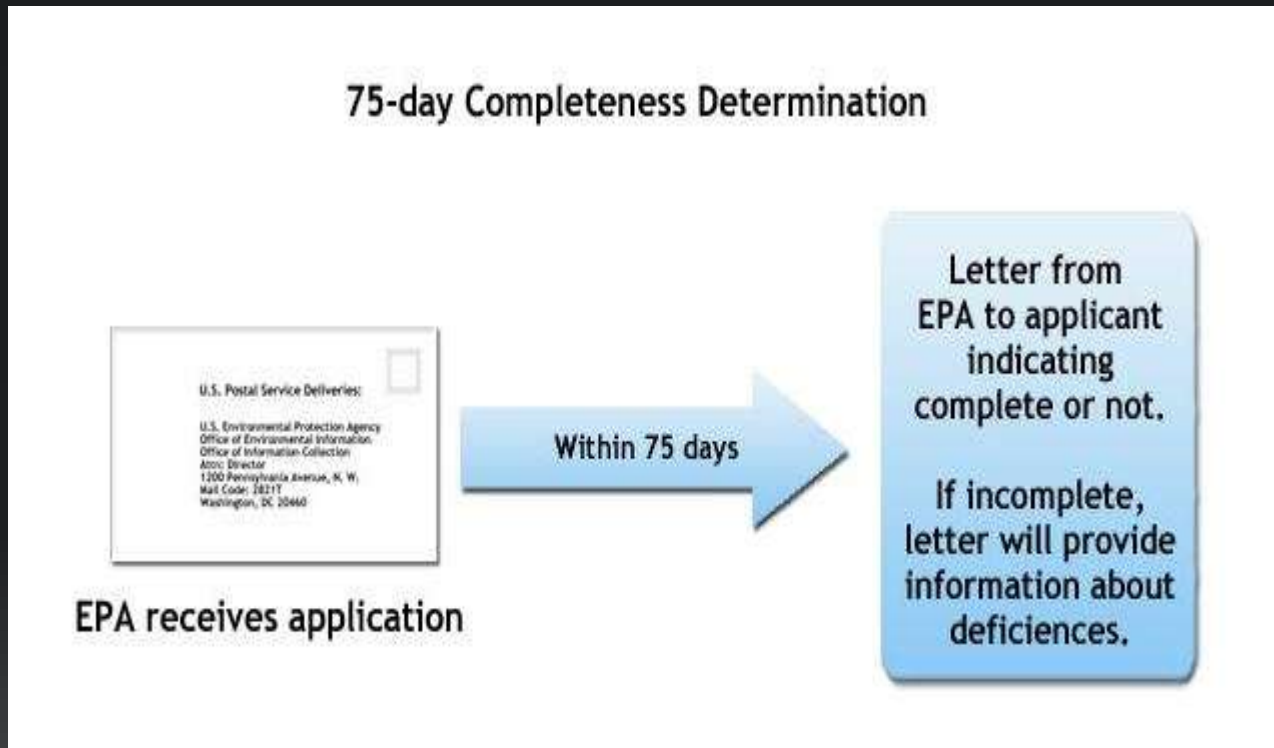
# Application forms



# Submission



# EPA Approval



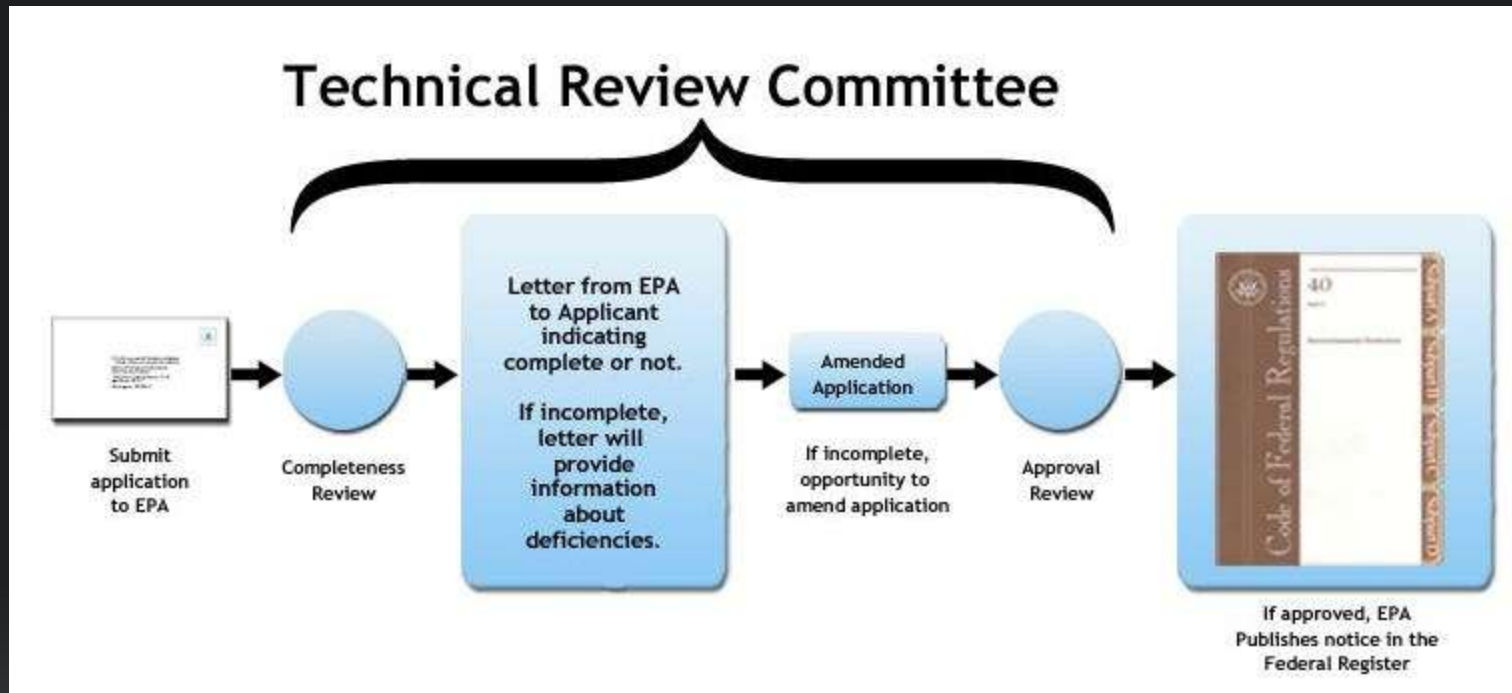
- Graphic from EPA CROMERR website [www.epa.gov/CROMERR/](http://www.epa.gov/CROMERR/)

# EPA Approval



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# EPA Approval



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# EPA Approval

## Technical Review Committee (TRC)

Applications formally submitted to the EPA are reviewed by an Agency-wide TRC, which includes representatives from the following offices:

- Office of Environmental Information (OEI)
- Office of General Council (OGC)
- Office of Enforcement and Compliance Assurance (OECA)
- Office of Air and Radiation (OAR)
- Office of Solid Waste and Emergency Response (OSWER)
- Office of Water (OW)
- Office of Chemical Safety and Pollution Prevention (OCSP)
- Office of the Inspector General (OIG)
- Each of the 10 EPA Regions



The TRC conducts both the completeness reviews and the approval reviews. The approval reviews conclude with a recommendation to the EPA Administrator, or their designee, to either approve or deny the application for program revision or modification.

- Graphic from EPA CROMERR website [www.epa.gov/CROMERR/](http://www.epa.gov/CROMERR/)



# EPA Approval

- Final Contractor review
- Multiple EPA committee/office reviews
  - 16 day shutdown in October 2013

# EPA Approval



- Application submitted Oct 23, 2012
- Application approved February 13, 2014
- 479 calendar days to approve.
- Do not assume automatic approval as stated in rule.

# The road ahead

- Linko Data Systems working with EPA to create checklist template form from our application
- EPA considering batch applications to consolidate approval process
- Exchange network leadership council IPT (integrated project team) created shared services platform
  - EPA maintained
  - Can be used to meet certain CROMERR requirements

# The road ahead

- Shared Services
  - Registration and identify management
  - Electronic signatures
  - Copy of record management
- [www.exchangenetwork.net/shared-CROMERR-services-ipt/](http://www.exchangenetwork.net/shared-CROMERR-services-ipt/)

# The road ahead

- Phased approach
  - 3 phases
    - Base level functionality
    - Increased functionality
    - Complex functionality
  - Beta testing with IU's
  - Go Live

# Final thoughts



- Contact anyone who may be involved and keep them in the loop
- City manager, asst. city manager, city attorney, CFO, State regulators, EPA regional contacts

# Final thoughts



- Figure out funding
- There will be revisions of the application
- Be patient, it will take longer than expected
- Keep in contact with the EPA & MDEQ

# Final thoughts

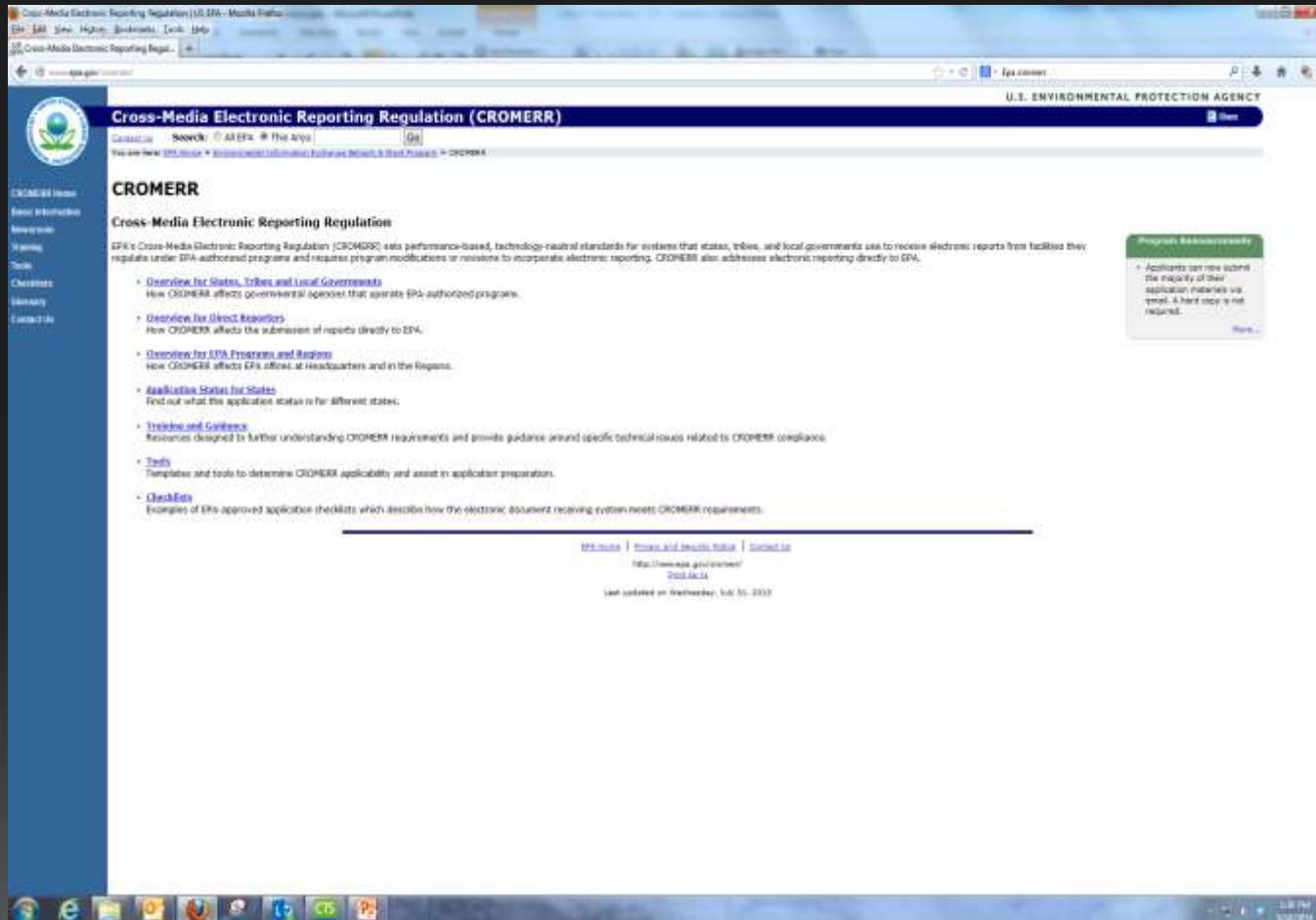


- Don't be afraid of "Why?"
- Be prepared dig into your IPP program business processes



# EPA CROMERR website

## www.epa.gov/CROMERR



The screenshot shows the EPA CROMERR website in a web browser. The browser's address bar displays "www.epa.gov/CROMERR". The website header includes the EPA logo and the text "U.S. ENVIRONMENTAL PROTECTION AGENCY". Below the header, the main title is "Cross-Media Electronic Reporting Regulation (CROMERR)". A search bar is visible with the text "Search: All EPA The Agency" and a search button. The main content area is titled "CROMERR" and "Cross-Media Electronic Reporting Regulation". It provides a brief description of the regulation and lists several key sections: "Overview for States, Tribes, and Local Governments", "Overview for Direct Reporters", "Overview for EPA Programs and Regions", "Application Status for States", "Training and Guidance", "Tools", and "Checklist". A "Program Background" box on the right side of the page contains information about application materials. At the bottom of the page, there are links for "EPA Home", "www.epa.gov/cromerr", and "Contact Us", along with the URL "http://www.epa.gov/cromerr/" and the text "Last updated on Wednesday, July 25, 2012".

U.S. ENVIRONMENTAL PROTECTION AGENCY

### Cross-Media Electronic Reporting Regulation (CROMERR)

Search: All EPA The Agency

## CROMERR

### Cross-Media Electronic Reporting Regulation

EPA's Cross-Media Electronic Reporting Regulation (CROMERR) sets performance-based, technology-neutral standards for systems that states, tribes, and local governments use to receive electronic reports from facilities they regulate under EPA-authorized programs and requires program modifications or revisions to incorporate electronic reporting. CROMERR also addresses electronic reporting directly to EPA.

- Overview for States, Tribes, and Local Governments**  
How CROMERR affects governmental agencies that operate EPA-authorized programs.
- Overview for Direct Reporters**  
How CROMERR affects the submission of reports directly to EPA.
- Overview for EPA Programs and Regions**  
How CROMERR affects EPA offices at Headquarters and in the Regions.
- Application Status for States**  
Find out what the application status is for different states.
- Training and Guidance**  
Resources designed to further understanding CROMERR requirements and provide guidance around specific technical issues related to CROMERR compliance.
- Tools**  
Templates and tools to determine CROMERR applicability and assist in application preparation.
- Checklist**  
Examples of EPA-approved application checklists which describe how the electronic document receiving system meets CROMERR requirements.

[EPA Home](#) | [www.epa.gov/cromerr](#) | [Contact Us](#)  
<http://www.epa.gov/cromerr/>  
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Last updated on Wednesday, July 25, 2012



Questions?

Thank you!