CROMERR Application Cover Sheet

Non-Federal: State Environmental Agency Tribe Local Government Agency				
Federal: EPA Program Proposal EPA Program Conformance Plan				
Ple	ease do not use acronym	s when completing this fo	orm	
Primary Contact Informa	ation			
First Name: Brandon	Last Name: Harris	Position: Information Strategic Planning Manager	Agency: Texas Commission on Environmental Quality	
Mailing Address (Street A City, State, Zip Code):	ddress, Mail Code/Suite,	E-mail: bharris@tceq.state.tx.us	Primary Phone: 512-239-4535	
MC-179 PO Box 13087 Austin, Texas 78711-3087	7	Fax: 512-239-0596	Secondary Phone:	
Secondary Contact Info	rmation			
First Name: Jessica	Last Name: Ogle	Position:	Agency: Texas Commission on Environmental Quality	
Mailing Address (Street A City, State, Zip Code): P.O. Box 13087	ddress, Mail Code/Suite,	E-mail: jogle@tceq.state.tx.us	Primary Phone: 512-239-6849	
Austin, TX 78711		Fax:	Secondary Phone:	
This application address	ses (check or complete a	ll that apply):		
⊠ Priority Reports ☐	☑ Non-Priority Reports	☐New Systems		
☐ The OEI CROMERR a	pplication checklist is used	I for this application		
Application under an authorized Part 142 Public Water System				
1 Number of systems addressed in this application				
Certifying Official				
☐ Certification of sufficient legal authority to implement electronic reporting by:				
First Name: Jeff	Last Name: Rose	Title: Deputy First Assistant Attorney General	Certification Date: 9/30/2008	
Copies of relevant law	s and regulations establish	ing legal authority are includ	ded	

CROMERR Application Cover Sheet

Complete for each system addressed by the application.

For additional systems, please make copies of this page.

System 1 of 1				
System Name: STEERS - State of Texas Environmental Electronic Reporting System				
		for each report received by se make copies of this page		
Report 1 Name:	Discharge Monitoring Rep	ports		
	40 CFR Citation: 122.41, 403.12	Associated EPA Office: OWM	Applicable EPA Region: All	
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No	
Report 2 Name:	Air Emissions and Mainte	nance Events		
	40 CFR Citation: 60.7 c and d	Associated EPA Office: OAQPS	Applicable EPA Region: All	
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature:	Priority Report: ⊠ Yes □ No	
Report 3 Name:	Industrial Hazardous Was	ste – Biennial Reports		
	40 CFR Citation: 262.41 and 264.75	Associated EPA Office:	Applicable EPA Region: All	
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature:	Priority Report: ☐ Yes ☑ No	
Report 4 Name:	TPDES (NPDES) Permit Applications			
	40 CFR Citation: 122.21 and 122.26	Associated EPA Office: OWM	Applicable EPA Region: All	
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes ☐ No	
Report 5 Name:	Petroleum/Underground Storage Tank (UST/PST) Self Certifications			
40 CFR Citation: 280.22, Part 280, subpart A-G Associated EPA Office: Applicable EPA All				
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No	

Report 6 Name:	Air Emissions Inventory Phase 1 – Bulk uploads Air Emissions Inventory Phase 2 – Interactive updates (Future – December 2009 pending further funding)		
	40 CFR Citation: 51.211, 51.1-51.45	Associated EPA Office: OAQPS	Applicable EPA Region: All
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: No	Priority Report: ⊠ Yes ☐ No
Report 7 Name:	Electronic Reporting of U	nauthorized Discharge Noti	fication
	40 CFR Citation: 122.41	Associated EPA Office: OWM	Applicable EPA Region: All
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: No	Priority Report: ☐ Yes ☑ No
Report 8 Name:	CSO Operational Plans		
	40 CFR Citation: 122.21	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 9 Name:	Long Term Control Plans	(CSO)	
	40 CFR Citation: 122.21	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 10 Name:	SRCERs (CSO)		
	40 CFR Citation: 122.21	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 11 Name:	DMR – QA reports		
	40 CFR Citation: 122.22	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 12 Name:	Annual Report for Ind SW GP		
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature:	Priority Report: ☐ Yes ☐ No
Report 13 Name:	Construction Strom Wate	r Pollution Prevention Plan((s)
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature:	Electronic Signature: X Yes No	Priority Report: ⊠ Yes □ No
Report 14 Name:	Industrial Storm Water Po	ollution Prevention Plan(s)	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: X Yes No	Priority Report: ⊠ Yes □ No
Report 15 Name:	Industrial SW – No Expos	sure Certification	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: No	Priority Report: ⊠ Yes ☐ No
Report 16 Name:	MS4 Certification for Dev from Municipal Operation	elopment Implementation to s	Reduce Pollution Runoff
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: No	Priority Report: ⊠ Yes ☐ No
Report 17 Name:	MS4 Certification for Development, Implementation, Management & Enforcement for Post-Construction Strom Water		
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes ☐ No

Report 18 Name:	MS4 Certification for Development, Implementation, Management & Enforcement of Sediment Control		
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: X Yes No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 19 Name:	MS4 Certification for Illicit	Discharge Detection	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature:	Priority Report: ☑ Yes ☐ No
Report 20 Name:	MS4 Certification for Pub	lic Education and Outreach	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature:	Priority Report: ☑ Yes ☐ No
Report 21 Name:	MS4 Certification for Pub	lic Participation and Involve	ment
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 22 Name:	MS4 Storm Water Annua	l Report	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: X Yes No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 23 Name:	MS4 Summary of Constru	uction Projects	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 24 Name:	MS4 SW Quality Manag	MS4 SW Quality Management Plan Part A		
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ⊠ Yes ☐ No	Priority Report: ☑ Yes ☐ No	
Report 25 Name:	MS4 SW Quality Manag	gement Plan Part A - Checkli	st	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 26 Name:	MS4 SW Quality Manag	gement Plan Part B		
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 27 Name:	MS4 SW Quality Manag	gement Plan Part B - Checklis	st	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ⊠ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 28 Name:	MS4 SW Quality Manag	gement Plan Part C		
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 29 Name:	MS4 SW Quality Manag	gement Plan Part C - Checkli	st	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ☑ Yes ☐ No	

Report 30 Name:	MS4 SW Sampling Data Results		
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 31 Name:	No Discharge Exclusion (Certification for Ind. SW GP	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 32 Name:	QA Monitoring Reports fo	r Construction SW General	Permit
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 33 Name:	Storm Water Sampling Re	esults for Any General Pern	nits
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 34 Name:	SWP3 Certification Check	dist	
	40 CFR Citation: 122.26	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 35 Name:			
	40 CFR Citation:	Associated EPA Office:	Applicable EPA Region:
	Requires Signature: Yes No	Electronic Signature:	Priority Report: ☐ Yes ☐ No

Report 35 Name:	Annual Pretreatment Program Reports		
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 36 Name:	Organic Pollutant Scan R	esults	
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 37 Name:	PT Enforcement Referral	Guides	
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 38 Name:	PT SIU Quarterly Reports		
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 39 Name:	Quarterly Pretreatment Pr	rogram Reports	
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 40 Name:	Sewer Use Ordinances		
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 41 Name:	Sludge Analytical Reports (PT)		
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 42 Name:	Application for a Site-Spe	cific Effluent Limit (NPDES)
	40 CFR Citation: 122.21(m) and 122.21(n)	Associated EPA Office: Office of Water	Applicable EPA Region:
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 43 Name:	Application for a Variance	}	
	40 CFR Citation: 122.21(m) and 122.21(n)	Associated EPA Office: Office of Water	Applicable EPA Region:
	Requires Signature: Yes No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 45 Name:			
	40 CFR Citation:	Associated EPA Office:	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature: Yes No	Priority Report:
Report 44 Name:	NPDES 24-Hour Reportin	ng Requirement	
	40 CFR Citation: 122.44(g)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 45 Name:	DMR Form for NPDES & IWP Permits		
	40 CFR Citation: 122.44(i)(2)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 46 Name:	CSO DMR		
	40 CFR Citation: 122.44(i)(2)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 47 Name:	CSO MRO		
	40 CFR Citation: 122.44(i)(2)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature: No	Priority Report: ⊠ Yes ☐ No
Report 48 Name:	CSO Treatment Fac. MR	0	
	40 CFR Citation: 122.44(i)(2)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 49 Name:	CSO Treatment Fac. MR	0	
	40 CFR Citation: 122.44(i)(2)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: X Yes No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 50 Name:	TTO Scan Testing Result	s	
	40 CFR Citation: 122.44(i)(2)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 51 Name:	Whole Effluent Toxicity Testing Results and TIEs and TREs		
	40 CFR Citation: 122.44(i)(2)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No

Report 52 Name:	POTW Submission of a Local PT Program		
	40 CFR Citation: 122.44(j)(2) and 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 53 Name:	NOI Letter for General Pe	ermits	
	40 CFR Citation: 123.25(a)(11) and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: ⊠ Yes ☐ No	Priority Report: ☑ Yes ☐ No
Report 54 Name:	Periodic NPDES Complia	nce Schedule Reports	
	40 CFR Citation: 123.25(a)(8)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 55 Name:	Permit Transfer Requests		
	40 CFR Citation: 123.25(a)(21) and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 56 Name:	Permit Modification Reque	ests	
	40 CFR Citation: 123.25(a)(22)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 57 Name:	Permit Termination Requests		
	40 CFR Citation: 123.25(a)(23)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 58 Name:	Application for Water Tre	Application for Water Treatment Additives (NPDES)		
	40 CFR Citation: 123.25(a)(4) and4.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ⊠ Yes □ No	Electronic Signature: ☐ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 59 Name:	NPDES 2A Application	NPDES 2A Application		
	40 CFR Citation: 123.25(a)(4) and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ☑ Yes ☐ No	
Report 60 Name:	NPDES 2C Application			
	40 CFR Citation: 123.25(a)(4) and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ☑ Yes ☐ No	
Report 61 Name:	NPDES 2D Application			
	40 CFR Citation: 123.25(a)(4) and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 62 Name:	NPDES 2E Application			
	40 CFR Citation: 123.25(a)(4) and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 63 Name:	NPDES 2B Application			
	40 CFR Citation: 123.25(a)(7) and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No	

Report 64 Name:	NPDES 2F Application		
	40 CFR Citation: 123.25(a)(9) and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes ☐ No
Report 65 Name:	Bypass/Overflow Reporting	ng	
	40 CFR Citation: 123.26(a) and 122.44(g)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes ☐ No
Report 66 Name:	Noncompliance Notification	on by Permittee	
	40 CFR Citation: 123.26(a) and 122.44(g)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature: ⊠ Yes ☐ No	Priority Report: ⊠ Yes □ No
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: ⊠ Yes ☐ No	Priority Report: ⊠ Yes ☐ No
Report 69 Name:			
	40 CFR Citation:	Associated EPA Office:	Applicable EPA Region:
	Requires Signature: Yes No	Electronic Signature: Yes No	Priority Report: Yes No
Report 67 Name:	POTW Pretreatment Base	eline Monitoring Report	
	40 CFR Citation: 403.12(b)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes ☐ No
Report 68 Name:	Periodic Pretreatment Compliance Schedule Reports		
	40 CFR Citation: 403.12(b)(7)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No

Report 69 Name:	Pretreatment DMR Form		
	40 CFR Citation: 403.12(e)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 70 Name:	Annual Pretreatment Rep	ort	
	40 CFR Citation: 403.12(i)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 71 Name:	Notification of Changed D	ischarge (PT)	
	40 CFR Citation: 403.12(j)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 72 Name:	Annual Certification by No	on-Significant CIUs (PT)	
	40 CFR Citation: 403.12(q)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 73 Name:	Permit Transfers for CIUs	/SIUs (PT)	
	40 CFR Citation: 403.8(f)(1)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 74 Name:	Application for Industrial Wastewater Pretreatment Permit		
	40 CFR Citation: 122.21(f) and 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 75 Name:	NPDES Application for Semipublic Wastewater Treatment Permit		
	40 CFR Citation: 122.21(f)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 76 Name:	NPDES Application for Pu	ublic Water Supply Permit	
	40 CFR Citation: 122.21(f) and (h)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 77 Name:	Annual Report for SW Mu	Ilti-Sector GP Authorization	
	40 CFR Citation:122.26 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 78 Name:	Storm Water Construction	GP Notice of Intent	
	40 CFR Citation: 122.26/122.28 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 79 Name:	Storm Water MSGP Notice	e of Intent	
	40 CFR Citation: 122.26/122.28 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 80 Name:	Storm Water MSGP No E	xposure Certification	
	40 CFR Citation: 122.26/122.28 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 81 Name:	MS4 Phase II GP Notice of Intent with Storm Water Management Plan		
	40 CFR Citation: 122.26/122.28 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 82 Name:	MS4 Phase II GP Waiver		
	40 CFR Citation: 122.26/122.28 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☑ Yes ☐ No
Report 83 Name:	Storm Water Sampling Re	esults for any SW General I	Permits
	40 CFR Citation: 122.26 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 84 Name:	SWP3 Certification Check	klist	
	40 CFR Citation: 122.26 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 85 Name:	Annual Pretreatment Prog	gram Reports	
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 86 Name:	Organic Pollutant Scan Results		
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 87 Name:	PT Enforcement Referra	PT Enforcement Referral Guides		
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 88 Name:	PT SIU Quarterly Report	s		
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 89 Name:	Quarterly Pretreatment F	rogram Reports		
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 90 Name:	Sewer Use Ordinances			
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ⊠ Yes □ No	
Report 91 Name:	Sludge Analytical Report	s (PT)		
	40 CFR Citation: 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 92 Name:	Application for a Site-Spe	Application for a Site-Specific Effluent Limit (NPDES)		
	40 CFR Citation: 122.21(m) and 122.21(n)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ⊠ Yes □ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes ☐ No	

Report 93 Name:	Application for a Variance	Application for a Variance		
	40 CFR Citation: 122.21(m) and 122.21(n) (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature:	Priority Report: ⊠ Yes □ No	
Report 97 Name:				
	40 CFR Citation:	Associated EPA Office:	Applicable EPA Region: 6	
	Requires Signature: Yes No	Electronic Signature: Yes No	Priority Report: ☐ Yes ☐ No	
Report 94 Name:	Whole Effluent Toxicity T	esting Results and TIEs and	d TREs	
	40 CFR Citation: 122.44(i)(2)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No	
Report 95 Name:	POTW Submission of a L	ocal PT Program		
	40 CFR Citation: 122.44(j)(2) and 403.8	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ☑ Yes ☐ No	
Report 96 Name:	Notice of Intent for any W	/astewater General Permit		
	40 CFR Citation: 122.28 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 97 Name:	Periodic NPDES Complia	Periodic NPDES Compliance Schedule Reports		
	40 CFR Citation: 122.25(a)(18)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ⊠ Yes □ No	

Report 98 Name:	Permit Transfer Requests		
	40 CFR Citation: 122.61	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: X Yes No	Priority Report: ⊠ Yes □ No
Report 99 Name:	Notice of Change for Any	General Permit Authorizati	on
	40 CFR Citation: 1122.28 (123.25)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: No	Priority Report: ⊠ Yes ☐ No
Report 100 Name:	Industrial Wastewater Pe	rmit Application for New, Re	enewal or Modification
	40 CFR Citation: 122.21 and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: No	Priority Report: ☑ Yes ☐ No
Report 101 Name:	Public and Private Dome Application for New, Ren	stic Wastewater or Water Trewal or Modification	reatment Permit
	40 CFR Citation: 122.21 and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 102 Name:	CAFO Permit Application	for New, Renewal or Modif	ication
	40 CFR Citation: 122.21, 122.23 and 124.3	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No
Report 103 Name:	Bypass/Overflow Reporting	ng	
	40 CFR Citation: 123.259a) and 122.44(g)	Associated EPA Office: Office of Water	Applicable EPA Region:
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 104 Name:	Noncompliance Notification by Permittee		
	40 CFR Citation: 123.25(a) and 122.44(g)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes □ No	Electronic Signature: X Yes No	Priority Report: ⊠ Yes □ No
Report 109 Name:			
	40 CFR Citation:	Associated EPA Office:	Applicable EPA Region: 6
	Requires Signature:	Electronic Signature: Ves No	Priority Report: Yes No
Report 110 Name:			
	40 CFR Citation:	Associated EPA Office:	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature: Yes No	Priority Report: ☐ Yes ☐ No
Report 111 Name:			
	40 CFR Citation:	Associated EPA Office:	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature:	Priority Report: ☐ Yes ☐ No
Report 105 Name:	POTW Pretreatment Base	eline Monitoring Report	
	40 CFR Citation: 403.12(b)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: X Yes No	Priority Report: ⊠ Yes □ No
Report 106 Name:	Periodic Pretreatment Compliance Schedule Reports		
	40 CFR Citation: 403.12(b)(7)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes ☐ No

Report 107 Name:	Pretreatment DMR Form			
	40 CFR Citation: 403.12(e)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature:	Priority Report: ⊠ Yes □ No	
Report 108 Name:	Surface Water Monthly O	perating Report (SWMOR)		
	40 CFR Citation: 141.570(a)-(d), 141.134(d)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature:	Electronic Signature: X Yes No	Priority Report: ☑ Yes ☐ No	
Report 109 Name:	Chlorine Dioxide Monthly	Operating Report (CIO2M0	DR)	
	40 CFR Citation: 141.134(b)(4), 141.134(c)(2)	Associated EPA Office: Office of Water	Applicable EPA Region:	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: X Yes No	Priority Report: ☑ Yes ☐ No	
Report 110 Name:	Texas Optimization Progr	ram Monthly Operating Rep	ort (TOPMOR)	
	40 CFR Citation: 141.722(c)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☒ No	Electronic Signature:	Priority Report: ⊠ Yes □ No	
Report 111 Name:	Bromate Monthly Operati	ng Report (BrMOR)		
	40 CFR Citation: 141.134(b)(5)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: X Yes No	Priority Report: ⊠ Yes □ No	
Report 112 Name:	Disinfection Level Quarte	Disinfection Level Quarterly Operating Report (DLQOR)		
	40 CFR Citation: 141.134(c)(1)	Associated EPA Office: Office of Water	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No	

Report 113 Name:	Total Coliform Rule (TCM) Sample Records		
	40 CFR Citation: 141.31(a)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☒ No	Electronic Signature: ☐ Yes ☒ No	Priority Report: ⊠ Yes □ No
Report 114 Name:	Lead/Copper (PbCu) Sar	mple Records)	
	40 CFR Citation: 141.90(a)-(h)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☒ No	Electronic Signature: ☐ Yes ☒ No	Priority Report: ⊠ Yes □ No
Report 115 Name:	Monitored Chemical (Mon	nChem) Sample Records)	
	40 CFR Citation: 141.31(a)	Associated EPA Office: Office of Water	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☒ No	Electronic Signature: ☐ Yes ☒ No	Priority Report: ⊠ Yes □ No
Report 116 Name:	Emissions Report		
	40 CFR Citation: 51, Subpart A	Associated EPA Office: Office of Air Quality	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No
Report 117 Name:	Miscellaneous Notificatio	ns and Reports	
	40 CFR Citation: 60 (NSPS)	Associated EPA Office: Office of Air Quality	Applicable EPA Region: 6
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No
Report 118 Name:	Miscellaneous notification	n and Reports	
	40 CFR Citation: 61-63 (MACT & NESHAP)	Associated EPA Office: Office of Air Quality	Applicable EPA Region: 6
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No

Report 119 Name:	Annual Compliance Certification		
	40 CFR Citation: 70.6	Associated EPA Office: Office of Air Quality	Applicable EPA Region: 6
	Requires Signature: No	Electronic Signature: X Yes No	Priority Report: ⊠ Yes □ No
Report 120 Name:	Quarterly Reports		
	40 CFR Citation: 70.6	Associated EPA Office: Office of Air Quality	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature: No	Priority Report: ☑ Yes ☐ No
Report 121 Name:	Quarterly Deviation and C	Compliance Monitoring Rep	orts
	40 CFR Citation: 70.6	Associated EPA Office: Office of Air Quality	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature: X Yes No	Priority Report: ⊠ Yes □ No
Report 122 Name:	Miscellaneous Notification	ns and Reports	
	40 CFR Citation: 70.6	Associated EPA Office: Office of Air Quality	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature:	Priority Report: ⊠ Yes □ No
Report 123 Name:	Emergency Occurrence F	Report	
	40 CFR Citation: 70.6	Associated EPA Office: Office of Air Quality	Applicable EPA Region: 6
	Requires Signature: Yes No	Electronic Signature: No	Priority Report: ⊠ Yes □ No
Report 124 Name:	312 Reporting – Hazardous Chemical Inventory Form (Tier II)		
	40 CFR Citation: 312	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region:
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ☐ Yes ☑ No

Report 125 Name:	Significant Manifest Disc	Significant Manifest Discrepancy Report		
	40 CFR Citation: 264.72(b), 265.72(b)	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 126 Name:	Biennial Report			
	40 CFR Citation: 264.75, 262.41	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ☑ Yes ☐ No	
Report 127 Name:	Unmanifested Waste Re	port		
	40 CFR Citation: 264.76, 265.76	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ⊠ Yes □ No	
Report 128 Name:	Noncompliance Report			
	40 CFR Citation: 264.1090	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ⊠ Yes □ No	
Report 129 Name:	Notification – Low Level	Mixed Waste		
	40 CFR Citation: 266.345	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ⊠ Yes □ No	

Report 130 Name:	Notification – Land Disposal Restrictions			
	40 CFR Citation: 268.9(d)	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No	
Report 131 Name:	Annual Ground Water Monitoring Report			
	40 CFR Citation: 266.94	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region:	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ⊠ Yes □ No	
Report 132 Name:	Resource Conservation and Recovery Act Permit Applications and Mofications			
	40 CFR Citation: 270.11, 270.42	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature:		Priority Report: ☑ Yes ☐ No	
Report 133 Name:	Certification of Closure and Post-Closure Care, Post-Closure Notices			
	40 CFR Citation: 264.116, 264.119, 264.119(b)(2)	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: Priority Report: ☐ Yes ☐ No ☐ Yes ☐ No		
Report 134 Name:	Certification of Testing Lab Analysis			
	40 CFR Citation: 270.63	Associated EPA Office: Office of Solid Waste and Emergency Response Applicable EPA Re		
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ☑ Yes ☐ No	

Report 135 Name:	Underground Storage Tank Notification			
	40 CFR Citation: 280.22	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 136 Name:	Free Product Removal Report and Subsequent Investigation Report			
	40 CFR Citation: 280.64, 280.65	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ☑ Yes ☐ No	Priority Report: ⊠ Yes □ No	
Report 137 Name:	Hazardous Waste Permit Repairs to Units			
	40 CFR Citation: 264.196(f)	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ⊠ Yes □ No	
Report 138 Name:	Hazardous Waste Permit Semi-Annual Groundwater Monitoring			
	40 CFR Citation: 264.97(j)	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ⊠ Yes □ No	
Report 139 Name:	Hazardous Waste Permit Trial Burn/Test Burn Reports			
	40 CFR Citation: 270.629(b)(7)	Associated EPA Office: Office of Solid Waste and Emergency Response Applicable EPA Re 6		
	Requires Signature: ☐ Yes ☐ No	Electronic Signature: ⊠ Yes □ No	Priority Report: ⊠ Yes □ No	

Report 140 Name:	Annual Waste Summary Reports			
	40 CFR Citation: 2674.75	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: Yes No	Electronic Signature:	Priority Report: ⊠ Yes □ No	
Report 141 Name:	Waste Minimization Reports			
	40 CFR Citation: 264.73(b)(9)	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ☑ Yes ☐ No	Electronic Signature: No	Priority Report: ☑ Yes ☐ No	
Report 142 Name:	MSW Annual Report			
	40 CFR Citation: 239	Associated EPA Office: Office of Solid Waste and Emergency Response	Applicable EPA Region: 6	
	Requires Signature: ⊠ Yes ☐ No	Electronic Signature: Yes No	Priority Report: ⊠ Yes □ No	

Brief Overview of System:

STEERS has been developed and built in such a manner that additional data reports may be added to the system with reduced effort. The security and CROMERR compliance concerns are implemented utilizing functions within STEERS that are shared by all existing data reports and future data reports are designed to adhere to those mechanisms. The mechanisms that STEERS uses to ensure the basic components of the rule are met will be utilized by the existing programs for existing reports and future reports. The TCEQ proposes to add reports under existing Programs as needs arise without further approval for those reports except in cases where the reports do not adhere to existing STEERS mechanisms or TCEQ business practices represented in this application/program.

Attachments included in this application for this system:

Description of how this system complies with CROMERR requirements under 40 CFR 3.2000

Schedule of planned upgrades or changes to this system

STEERS has been developed and built in such a manner that additional data reports may be added to the system with reduced effort. The security and CROMERR compliance concerns are implemented utilizing functions within STEERS that are shared by all existing data reports and future data reports are designed to adhere to those mechanisms. The mechanisms that STEERS uses to ensure the basic

components of the rule are met will be utilized by the existing programs for existing reports and future reports. The TCEQ proposes to add reports under existing Programs as needs arise without further approval for those reports except in cases where the reports do not adhere to existing STEERS mechanisms or TCEQ business practices represented in this application/program. For reference, we have included a list of the reports that are currently under development here at TCEQ along with target dates for completion.

- 1) State Implementation Program Air Emissions Inventory Phase 2 Interactive updates (Future December 2009 pending further funding)
- 2) New utility for staff to verify data against data hash. The utility will accept a program area and confirmation number and then perform a hash of the data submitted and compare it to the stored hash and then verify if it is consistent or if there has been an unauthorized modification. FY09 (August 2009).

Other Attachments (Please list):

Attachment 1 - Example of SPA when user claims direct authority

• E-sign.pdf - this is a PDF of the SPA when the user is claiming authority to enter the agreement (so there is only one signature block) and the user is signing electronically.

Attachment 2 - Example of SPA when user claims delegated authority

- Spa_paper_modify.pdf this is a PDF of the hardcopy SPA a user would use to modify his account when an authorizing signature is required. The SPA for the original account creation is the same except "modify" is not in the title.
- Spa_paper_renew.pdf this is a PDF of the hardcopy SPA a user would use to renew his
 account when an authorizing signature is required.
- E-sign_auth.pdf (and e-sign_auth_xml.txt) this is a PDF showing the process a person would use to electronically sign the authorization delegating authority to another person.

Attachment 3 – SPA Software Requirements Specifications

• Spa_srs.doc - Requirements document used to develop and maintain the SPA application.

Attachment 4 – SPA System Design Document

• Spa_sdd.doc – Design document used to develop and maintain the SPA application.

Attachment 5 - Online SPA Processing

onlinespaSOP.wpd – documentation on manual processes for the online SPA.

Attachment 6 – SPA / Third Party Verification Interface Document.

 spa_TDL_interface.doc – documentation on the third party authentication verification used in the SPA application

Attachment 7 – STEERS Software Requirements Specifications

srs_steerssec.doc – requirements document used to develop and maintain the core STEERS application

Attachment 8 – STEERS System Design Document

steers sdd.doc – design document used to develop and maintain the core STEERS application

Attachment 9 – Examples of Copy of Record files

- AEME_init.pdf (and AEME_init_xml.txt) example of an initial emissions event notification
- AEME_final.pdf (and AEME_final_xml.txt) example of a final emissions event report
- IHW_Chg._Contact_Info.pdf (and IHW_Chg._Contact_Info_xml.txt) example of a contact information change submittal
- IHW_Chg_Fac_Info.pdf (and IHW_Chg._Fac_Info_xml.txt) example of a facility information

- change submittal
- IHW_AWS.pdf (and IHW_AWS.xml.txt) example of a IHW AWS(Annual Waste Summary) submittal
- IHW_AWS_NRR.pdf (and IHW_AWS_NRR_xml.txt) example of a AWS(Annual Waste Summary) for a NRR(No Report Required) submittal
- WRS.pdf (and WRS_xml.txt) example of a IHW WRS(Waste Receipt Summary) submittal
- WRS_NO_Shp.pdf (and WRS_NO_Shp_xml.txt) example of a IHW WRS_NO_Shp(Waste Receipt Summary for a No Shipment Required) submittal
- DMR.pdf (and DMR_xml.txt) example of a Discharge Monitoring Report submittal
- PST_Self_Cert.pdf (and PST_Self_Cert_xml.txt) example of a Petroleum Storage Tank Self Certification
- SW_CNOI_COR.pdf, SW_CNOI_Certif.pdf, SW_CNOI_Let.pdf (w/ SW_CNOI_COR_xml.txt SW_CNOI_Let_xml.txt and, SW_CNOI_Certif_xml.txt) – example of a SW Construction Notice of Intent copy of record, letter of authorization and certificate
- SW_INEC_COR.pdf, SW_INEC_Let.pdf (w/SW_INEC_Let_xml.txt and SW_INEC_COR_xml.txt) example of a SW copy of record, letter of authorization
- SW_INOI_COR.pdf, SW_INOI_Certif.pdf, SW_INOI_Let.pdf (w/SW_INOI_COR_xml.txt SW_INOI_Let_xml.txt and SW_INOI_Certif_xml.txt) – example of a SW Industrial Notice of Intent copy of record, letter of authorization and certificate
- SW_Term_COR.pdf, SW_Term_Let.pdf (w/SW_Term_COR_xml.txt and SW_Term_Let_xml.txt) example of a SW Termination copy of record, letter of authorization

Attachment 10 – examples of pre-signature screens

- AEMEBatch_Sign_Submit.pdf example of screen for AEME batch signatures
- AEME_Sign-Sub.pdf example of screen for single AEME signature
- CNOIBatch_Sign.pdf example of screen for CNOI batch signature
- CNOI_Sign.pdf example of screen for CNOI signature
- WRS_Sign_Submit_Pg.pdf

Attachment 11 – examples of challenge question

- SPA Security Questions.pdf example of selecting and answering security questions
- new account email.pdf example of email with URL to set up password.

CROMERR System Checklist

Item

STEERS - State of Texas Environmental Electronic Reporting System

Registration (e-signature cases only)

1. Identity-proofing of registrant

Business Practices:

The agency requires registrants to complete an electronic signature agreement called the STEERS Participation Agreement (SPA) before using STEERS to submit data electronically. The SPA requires a signature which may be wet-ink on paper or an electronic signature using the Texas Online Authentication service. The system creates an account for the user immediately, but it is probationary until the signed SPA is processed. Once the signed SPA is processed, the probationary status is removed. The account is associated with program areas (IHW, DMR, AEME, SW and PST) and to specific facilities within those programs for all programs but stormwater. The signature authority requirements for each program area are different. The user must indicate for each program area/site combination if they have direct authorization or who has delegated them the authority

System Functions:

- Accounts are created for users after they complete the online SPA.
 - a. Require user to select and answer 5 challenge questions. The answers to those questions will be stored in a hashed format (SHA-256)
 - b. Account creation email contains a URL with a verification key. The user will need to click on the link which will open a secure window. The user can then create his password if he answers a randomly selected challenge question successfully.
 - Store password in a password log using SHA-256 hash algorithm.
- Probationary accounts may only be used to modify "my account" information and to submit
 initial air emissions events reports (see item 1a for a full description of the initial air emissions
 event reporting). They may not be used to submit any other data.
- The electronic signature of a report is accomplished when the user provides the correct password for his assigned account.
- The system provides for read, prepare/edit and signature roles.
- The system validates program area authorization rules before granting access to that program
 area/site. An example of a signature authorization rule is that storm water users wanting the
 signature role must claim direct authority and not delegated authority. The system also
 provides the regulatory provision containing the required level and type of signature
 authorization for each program area.
- The system includes the text specified in the SDD on pages 23-24 (Attachment 3) as shown in the SPA examples (Attachments 1 & 2).
- The system collects the full name, title, company name, mailing address, phone number and email address of each user.
- The system requires a unique email address for each account.

Supporting Documentation (list attachments):

Attachment 1 - Example of SPA when user claims direct authority

Attachment 2 - Example of SPA when user claims delegated authority

Attachment 3 – SPA Software Requirements Specifications

Attachment 4 – SPA System Design Document

Attachment 5 - Online SPA Processing

Attachment 6 – SPA / Third Party Verification Interface Document. Specifications for the Texas Online Authentication service can be provided upon request.

Attachment 7 – STEERS Software Requirements Specifications

Attachment 8 - STEERS System Design Document

Attachment 11 - examples of challenge questions and new account email

1a. (priority reports only) Identity-proofing before accepting e-signatures

Business Practices:

A STEERS account is necessary to submit data through STEERS. In all instances, except as noted below, the account cannot be used for reporting until a signed SPA has been completely processed.

Note: AEME initial reports, which must be submitted within 24 hours of the event, can be created, signed, and submitted using a probationary account. Reports submitted with a probationary account are marked as pending and are unavailable to the public. The system sends an email to other non-probationary accounts with authority to report for that site informing them of the initial report submitted by the probationary account asking them to verify the report with their valid electronic signature. Once the report has been verified by a user with a non-probationary account with access to report for that site, the pending status is removed and the data is accepted and made available to the public and TCEQ staff for use. A COR is created to document that a valid electronic signature has been applied to verify the submittal.

System Functions:

- STEERS will not allow a user's electronic signature device (password) to sign electronic documents until a signed SPA has been received and processed (except for AEME initial notifications).
- The system requires the user to provide his password when initially logging on the system as well as at the time of submittal.

Supporting Documentation (list attachments):

Attachment 3 – Software Requirements Specifications for SPA

Attachment 4 – System Design Document for SPA

1b. (priority reports only) Identity-proofing method (See 1bi, 1bii, and 1b-alt)

1bi. (priority reports only) Verification by attestation of disinterested individuals

Business Practices:

The TCEQ maintains a state database to record and track the authorized representatives of sites by program areas.

Wet-ink Signature:

TCEQ staff use due-diligence when receiving signed SPAs. If needed, they either phone the facility directly to verify the authority of the signatory or can compare the authority stated on the SPA with previously emailed hard-copy reports. Furthermore, periodic inspections by TCEQ field staff may include validation of the authorized facility representative who signed the SPA for specific reports received by the TCEQ.

Electronic signature:

The option of electronically signing the SPA is available. This process is done using an authentication service provided through Texas Online which is the government portal for the state managed by the Texas Department of Information Resources. The authentication service uses the data maintained by the Texas Department of Public Safety. This is done through system functions, not a separate business practice, see "Third Party Authentication" below.

Both of the above options are available for all reports covered in our system.

System Functions:

Wet-ink Signature:

 Accounts are created and automatically set to probationary status until the signed SPA is processed by TCEQ staff. For SPAs with wet-ink signatures, the probationary status must be removed manually by staff.

Third Party Authentication:

- The user provides four different pieces of information Texas driver's license number (unique to individual), driver's license audit number (unique to physical driver's license), date of birth and last four digits of his social security number. This information must come from at least 2 different sources because the Texas Driver's License does not contain the social security number. The audit number and the social security number are protected pieces of information and are not readily available to the public. The Texas Driver's license number is only available on a Texas State Driver's license and in the Texas DPS NON-public data system.
- The system passes the above information to the Texas Online authentication service which returns a success or failure code. A successful return code means that ALL four data items were associated to the same individual and the identity has been authenticated by the Texas Department of Public Safety (TDPS). If any of one of the items does not match, then the identity is not verified and a code returned indicating such. Depending on the value of the code, a failure code may mean there is a problem with the call or the identity was not authenticated.
- The transaction identifier, date/time stamp, name of signer and return code from TDPS are saved in the system. The driver's license number, audit number, date of birth and partial social security numbers are not saved in the system in accordance with state privacy standards and rules governing use of the TDPS authentication service.
- The system creates a copy of record for the authentication activity which is stored in the database and activates the user's account for all IDs for which they claim direct authorization.

Supporting Documentation (list attachments):

Attachment 5 – Online SPA Processing

Attachment 6 – SPA/Third party verification interface document

CROMERR System Checklist			
1bii. (priority reports only) Information or objects of independent origin			
	ss Practices:		
See 1bi			
	Functions:		
See 1bi			
	ting Documentation (list attachments):		
See 1bi			

1b-alt.	(priority reports only) Subscriber agreement alternative
	Business Practices: See 1bi.
	System Functions: See 1bi.
	Supporting Documentation (list attachments): See 1bi.
2. Dete	ermination of registrant's signing authority

Business Practices:

The TCEQ must receive a signed SPA from each user who is requesting the ability to sign reports to be submitted electronically. During the SPA process, users are provided the rule citation for the specific TCEQ requirement for signing authority for each program area for which authorization is requested. In executing the SPA, the user is affirming that they meet the applicable signature authority requirements.

Site inspections and administrative audits may include review and verification of claimed signature authority. If circumstances indicate a claimed authority may not be appropriate, this will trigger an administrative review. This process is the same as or more stringent than that currently being followed for the equivalent paper submissions.

System Functions:

The system provides the applicable rule citation for the report type for the user to reference and provides a mechanism for the user to indicate if the regulatory requirements are met.

Supporting Documentation (list attachments):

Attachment 1 & 2 - examples of SPAs showing citations for applicable regulatory requirements

CROMERR System Checklist

3. Issuance (or registration) of a signing credential in a way that protects it from compromise

Business Practices:

System Functions:

- I. STEERS provides the following mechanisms to securely issue signing credentials:
 - 1. The SPA contains language requiring the user to protect their signing credential, not share it with anyone else, and report any compromise to the TCEQ (see Checklist Item 4 below).
 - a. The account registration process requires users to have some knowledge of the program areas and specific sites for which they want to report.
 - b. The account registration process (as well as STEERS sessions) takes place within a secure socket layer.
 - c. Account registration starts when a user enters base account information including name, company name, title, email address, phone number and mailing address. Next, the application verifies that the user has provided a unique email address. Then, the user is required to provide answers to five security questions from a master list of at least 60 questions. The answers to the security challenge questions will be stored in a hashed format (SHA-256). The security questions serve to link the original registrant with the user accessing the verification page (see d. below) and assure that the registrant has access to the specified email account. If an invalid account was specified, the original registrant would never receive the Verification Key and would not be able to set the account password. If the wrong person received the email, he/she would not know the answer to the randomly selected security question to set the account password.
 - d. Once the user has clicked on the verification email link, the user can then create his password after providing the correct answer to a randomly selected challenge question. The password is stored in a password log using SHA-256 hash algorithm. The challenge question answers are hashed using SHA-256 and the hash stored in the database. The user will use the password he created to electronically sign submittals.
 - e. If the registrant enters the wrong password 5 times or answers 3 consecutive challenge questions incorrectly, his account is locked and he must contact the TCEQ to get it unlocked.
 - f. Passwords must meet the following criteria:
 - 1. Be between 8 and 20 characters long
 - 2. Contain at least one number
 - 3. Contain at least one letter
 - 4. Contain numbers and letters only
 - 5. Begin with a letter
 - 6. Must be different than the previous password
 - g. The process above is the same for everyone (handwritten signature or TDPS identity proofing process). All accounts are created as probationary and remain so until we either receive a paper SPA with handwritten signature or the SPA is signed using the TDPS identity proofing process. If the user opts to sign electronically, the TDPS identity proofing process occurs after the user completes data entry of base account information.
 - h. Only non-probationary accounts have access to STEERS beyond the "My account" page (except for AEME initial notifications see Note on 1a.).

Supporting Documentation (list attachments):

Attachment 3 – Software Requirements Specifications for SPA

Attachment 4 – System Design Document for SPA

Attachment 11 - examples of challenge questions and new account email

4. Electronic signature agreement

Business Practices:

Users must obtain a STEERS account and password to be able to use STEERS to submit electronic reports. A completed STEERS Participation Agreement (SPA) is required to get the account and password. The SPA process requires the user to provide his name, title, company, mailing address, phone number, email address, and answers to selected challenge questions as well as provide which program areas and sites he wants to use his account for along with the affirmation of authority to report for each program area/site combination.

System Functions:

- The system requires a valid logon with an account, associated password, and successfully answered challenge question to access any of the features of the system.
- The agreement includes essentially the following language:

As an account holder, I agree

- 1. to protect my password from use by anyone except me, to maintain the secrecy of my password by not revealing it to anyone else, and to change it if I believe it becomes known to any other person;
- 2. to report to the TCEQ STEERS help line, within twenty-four (24) hours of discovery, any evidence of the loss, theft, or other compromise of my user account or password;
- 3. to notify the TCEQ STEERS help line if I cease to represent any of the sites named above as a preparer and or submitter of that organization's electronic reports to STEERS as soon as this change in relationship occurs.
- 4. and understand that I will be held as legally bound, obligated, or responsible for any electronic signature using my account and password as I would be using my handwritten signature, and that legal action can be taken against me based on the use of my account and password in signing and submitting an electronic document to the TCEQ;
- 5. to review the acknowledgments and copies of documents signed and submitted electronically using my account and PIN to STEERS;
- 6. to report to the TCEQ STEERS help line, within twenty-four (24) hours of discovery, any evidence of discrepancy between an electronic document I have signed/submitted and what STEERS has received from me;
- 7. that in no event will the TCEQ be liable to me or my employer for any special, consequential, indirect or similar damages, including any lost profits or lost data arising out of the use or inability to use the software or of any data supplied therewith even if the TCEQ or anyone else has been advised of the possibility of such damages, or for any claim by any other party. The TCEQ disclaims all warranties, express or implied, including but not limited to implied warranties of merchantability and fitness for a particular purpose, with respect to the software and the accompanying written materials.
- 8. that data electronically submitted using this Account shall also be considered to contain the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly

responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment.

9. that data in the work area that has not gone through the action of submittal (caused by pressing the submit button) is not considered to be submitted data. Even though the data resides on a TCEQ controlled computer, it is considered to be in draft form and will not be considered to meet any reporting requirements until I have taken action to submit the data. I certify that

I, Jessica Testuser,	have the authority	y to enter into	this Agreement	for TES	T under	the
applicable standard	s listed below.					

Jessica Testuser
Printed Name

Date

Title

TEST
Company Name

TEQ CN
(if known)

Signature Authority Standards:

Industrial and Hazardous Waste (IHW)

see 40 CFR 270.11(b)

Petroleum Storage Tank (PST)

see 30 TAC 334.8(c)(4)(A)(iv)

Air Emissions and Maintenance Events (AEME)

see 30 TAC 101.201 and 30 TAC 101.211

Discharge Monitoring Report (DMR)

see 30 TAC 305.128, 305.44(a) and (b)

Storm Water General Permits (EPR_SW)

see 30 TAC 305.44

Supporting Documentation (list attachments):

Attachment 1 - Example of SPA when user claims direct authority

Attachment 2 - Example of SPA when user claims delegated authority

Attachment 11 – examples of challenge questions and new account email

CROMERR System Checklist

Signature Process (e-signature cases only)

5. Binding of signatures to document content

Business Practices:

The user's signature is the combination of his account (which could be considered a Personal Identification Number) and the password associated to it. The electronic signature is tied to the COR by the account number, confirmation number, and the COR hash code. The information is in the submit log table and in the COR itself. The system includes a hash of the password in the Copy of Record to record the electronic signature.

System Functions:

Sign/Submit Process

The signature process is a multi-step process:

- 1. The user must have logged onto the system by entering his account id, associated password, and correct answer to the posed challenge question. This is a pre-requisite to access any of the features of the system.
- 2. User is presented a screen with opportunity to review data and the appropriate certification statement.
- 3. User enters password and presses submit button. The 'press' of the button is affirmative where the button must actually be clicked or tabbed to and enter pressed to prevent accidental submissions.
- 4. System checks that the password matches the account and the account has the correct role to sign.
- 5. A confirmation number for the submission is generated.
- 6. An XML string of the data being submitted is generated and hashed using the SHA-256 hash algorithm. This string contains no XML header. It is only the data being submitted.
- 7. The full XML COR is generated by adding the XML declaration and other sections of the COR like the certification statement including signature, header and additional information sections. The additional information section contains the submittal date, confirmation number, data hash code, STEERS version, and IP address of the user.
- 8. The full XML COR is hashed using the SHA-256 hash algorithm.
- 9. An entry is made into the submit log table with the following information:
 - a. Report type
 - b. Submission date and time
 - c. Account number
 - d. Confirmation number
 - e. Program area abbreviation
 - f. Data hash code (also in the COR)
 - g. COR file name
 - h. COR creation date
 - i. Acknowledgement date
 - j. STEERS version
 - k. Application server IP address
 - Oracle server IP address
 - m. COR hash code
- 10. The COR is stored in the copy of record table as a CLOB. 'CLOB' is an Oracle data type which stands for a large character field. It can hold up to 2 gigs of text.
- 11. The data is marked as submitted, or processed into the next system.
- 12. The user is sent a confirmation email with the confirmation number, data hash code, submission date and time, and directions on how to search for the COR in STEERS. This email is copied to up to 25 other accounts with access to the same program area ID.

13. A confirmation page is displayed with the confirmation number, data hash code, and instructions for the user to print the page.

TPDES Permit Applications (Report number 4 on the cover sheet) separate the sign and submit processes which allow an individual other than the signatory to initiate the submission process (similar to someone else mailing a wet-ink signature report). In these cases, the submission process can only be initiated after a valid signatory has applied their electronic signature to the information by entering a valid account and password combination. Certification statements on the signature page include text essentially indicating that they are in agreement with the information in this report, and authorize its submittal to the TCEQ.

At the time of signing, STEERS creates a hash of the signed data using the SHA-256 hash algorithm.

Only then can another user log into STEERS and initiate the submission. If any part of the already signed data is edited, the valid signature is removed and the data cannot be submitted. Prior to the submittal being accepted by STEERS, a new hash of the data is created. If this new hash is different from the hash created at the time of signing, the submission is rejected by STEERS. In addition, when the submission is generated an email is sent to all accounts with access to that program area/site indicating that a submission was made.

STEERS allows users to submit single or multiple reports of the same type (batch) within a single transaction for a single program area/site combination. STEERS will create a unique Copy of Record (COR) for each report that is submitted, whether the submittal was done individually or in a batch. The process used to create the COR is detailed below.

Copy of Record (COR)

- The COR is created for each submitted report. It is an XML document where the XML tags provide semantic meaning to the data. The document includes:
 - 1. All the data in the report with tags that identify the meaning of each data element.
 - 2. Legal Certification Statements displayed to user during signing process
 - 3. Hash of the data portion of the file.
 - 4. Confirmation number
 - 5. STEERS version
 - 6. Date/Time of the submission
 - 7. Attachment name, description, and hash of document (required for some TPDES permits)
 - 8. Identifying information from the signing account, including:
 - a. The user's full name
 - b. Account Login
 - c. Email Address
 - d. IP of submitting computer
 - e. Hashed version of password

Hash Algorithm

• STEERS uses SHA-256 to generate all hash values. This was the current approved FIPS standard when STEERS was initially developed.

Confirmation Number

A unique confirmation number for each report type is generated for each submission. If multiple
reports are submitted at the same time, each report within the submission will have the same
confirmation number.

Batch Receipt

- A batch receipt is created for each batch of reports that are submitted. The batch receipt is an XML document where the XML tags provide semantic meaning to the data. A receipt is not created for single report submissions. The batch receipt includes
 - 1. Confirmation Number

- 2. List of reports submitted in the batch submittal.
- Date/Time of the submission
- 4. Identifying information from the signing account, including:
 - a. The user's full name
 - b. Account Login
 - c. Email Address
 - d. IP of submitting computer
 - e. Hashed version of password

COR Signature

The XML COR is hashed and the hash is stored in the database.

Confirmation Page Acknowledgement

The confirmation page acknowledgement includes:

- 1. The confirmation number of the submission
- 2. The report type of the submission.
- 3. The date/time of the submission.
- 4. The COR Signature hash code.
- 5. Instructions to download the COR and view it online.

Email Acknowledgement

The email acknowledgement is sent to the user who submitted the application as well as other accounts with access to the same program area/site when possible. It includes:

- 1. Acknowledgement that an electronic submittal was received.
- 2. The confirmation number of the submission
- 3. The hash from the submission
- 4. The report type of the submission.
- 5. The date/time of the submission.
- 6. Instructions to access the copy of record for viewing or downloading.

COR Alteration Protection

The purpose of the COR signature is to provide assurances that the data was submitted through STEERS. COR signatures can be verified by generating the hash value of the COR and comparing it to the hash stored in the STEERS submittal log. There are several mechanisms that allow us to detect unauthorized changes to the data. First, the person would have to have access to the database and change the data. This is extremely difficult. The person would have to have an Oracle account with the appropriate update role that was set as a default. Oracle accounts are assigned an update role if needed, but their default is the read role, not update. There is a special procedure that must be called that temporarily allows the non-default update role to be activated. This privilege is for one Oracle call. Assuming the person found a way around this, the person would have to have knowledge of the hash algorithm used and regenerate the hash. In addition to regenerating the hash, the individual would need to modify additional tables (submittal tables which store certain data including the COR hashed code at the time of submittal) in the database to use the regenerated hash. The modification of these tables could be detected from the Oracle audit logs. TCEQ enables Oracle auditing on the STEERS database table, therefore, any time a record is modified, added, or deleted, our audit logs have record of the change. To prevent detection, the person would then have to modify the Oracle audit logs to delete the records documenting the changes. There are nightly backups of the Oracle database including the audit logs, so the changes would have to take place between the time the data was submitted and that evening when the backup was run, or the person would also have to find the backup (housed off-site and on non-changeable media/tape drives) and try to modify/re-create the backup as well.

For additional information, please see Attachment 7 which contains a description of possible scenarios for data manipulation.

Supporting Documentation (list attachments):

Attachment 7 – srs_steerssec.wpd Attachment 10 – CNOI_SIGN.pdf

6. Opportunity to review document content

Business Practices:

System Functions:

During the signing process the user will be presented with a verification page. The verification page includes:

- 1. A read-only view of the data (or access to the data) they selected to sign and intend to submit. The data will be displayed in a manner that provides the user the opportunity to review the data, but does not require the user to review it. For example, the report may be displayed in a summary format with the ability for the user to expand the report to display all the information. If the user is submitting uploaded attachments the file name, description and hash of content will be included. The user must have the necessary application to review the file he attached.
- 2. Certification statements
- 3. A text box for supplying the account password.
- 4. A cancel button to avoid signing the information.

Supporting Documentation (list attachments):

Attachment 10 - Examples of pre-signature screens

7. Opportunity to review certification statements and warnings

Business Practices:

System Functions:

During the signing and submission process, the user will be presented with a verification page. The verification page includes the certification statements described below:

- 1. A general certification statement stating the user
 - a. Has the name associated to currently logged on account
 - b. Has protected the account/password and is in compliance with the ESA submitted to obtain the account being used.
 - c. Has the authority to submit the data on behalf of the facility.
 - d. Agrees that providing the account password to sign the document constitutes an electronic signature equivalent to his/her written signature.
 - e. Is knowingly and intentionally submitting <#> of <report type> records.
 - f. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations
- A report type certification statement equivalent to the certification statement on the paper report form.

Supporting Documentation (list attachments):

Attachment 10 – Examples of pre-signature screens

CROMERR System Checklist

Submission Process

8. Transmission error checking and documentation

Business Practices:

System Functions:

The integrity of the submission is protected in the following ways:

- 1. No alteration of the document content is expected during transmission or after it is received.
- 2. The entire session takes place over the Secure Sockets Layer (SSL) protocol v3 or Transport Layer Security v1.0. This protects against man-in-the-middle attacks.
- 3. The information used for the verification page comes from data already stored in the STEERS database. The data is preserved and cannot be changed from the time the signature is applied until after the COR is created. With the protection in place from man-in-the-middle attacks, this provides a high level of assurance that the user is seeing the data as it is stored in the database.
- 4. The information in the data XML document used for the COR comes from data already stored in the STEERS database. The data is preserved and cannot be changed from the time the signature is applied until after the COR is created. With the protection in place from man-in-the-middle attacks, this provides a high level of assurance that the user is seeing the data as it is stored in the database.
- The data hash and COR signature can be recomputed, if needed, to compare against the original values.
- 6. The submitter has the opportunity to review the data during data entry, the submission process, and the COR review process. If the data was uploaded the opportunity to review the data is provided prior to signing. This provides the user the opportunity to determine if transmission errors occurred.
- 7. Emails are sent to the submitter and other account holders for the same program area/site combination if possible.

Supporting Documentation (list attachments):

9. Opportunity to review copy of record (See 9a through 9c)

9a. Notification that copy of record is available

Business Practices:

System Functions:

Submitters are informed and made aware of the availability of CORs in multiple ways:

- 1. The submitter is automatically sent an email notification after each submission. The email contains information on how to access the COR.
- 2. Submitters are informed of the COR with links to it immediately after the submittal.
- 3. All account holders with authorization for a program area/site combination have the ability to view all CORs submitted for that program area/site combination at any time using STEERS. This is

documented in the STEERS help system.			
Supporting Documentation (list attachments):			
9b. Creation of copy of record in a human-readable format			
Business Practices:			

System Functions:

See Item 5 for information on what is contained within the COR. The COR is an XML document which contains all the appropriate information for the submission. Style sheets are available to render the XML document to display similarly to the appearance of the data during the submittal process.

The use of appropriately named XML tags allows the view to understand the data in its raw XML format.

Certain TPDES permits require supporting documentation such as maps and diagrams. These documents are stored in their native format. The user if required to have the appropriate application to view the attached file.

• Supporting Documentation (list attachments): Attachment 9 – Examples of Copy of Record files

CROMERR System Checklist

9c. Providing the copy of record

Business Practices:

System Functions:

STEERS creates the COR during the submission process. Signatories are notified of the COR in an email acknowledgement and on the confirmation page during the submission process. The email includes directions for viewing the COR. The confirmation page gives instructions to download the COR as well as to view it online. All users with access for a program area/site combination can view the CORs for that program area/site combination. They can view submitted CORs by logging STEERS and searching for CORs for the specified program area/site combination.

The COR can be presented in a human-readable format in two ways:

COR can be presented in a numan-readable format in t
 Download

STEERS allows users to download the COR. The user can also download and apply the XSL style sheet to the Data XML document to present it in a friendlier html.

2. Online Viewing

STEERS provides a mechanism to allow user to view the contents of the COR online. STEERS automatically applies the XSL style sheet to provide the most user-friendly view of the data.

Supporting Documentation (list attachments):
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10. Procedures to address submitter/signatory repudiation of a copy of record

Business Practices:

The anticipated reasons a user would want to repudiate a COR include:

- 1. The data submitted is incorrect, and a correction needs to be provided.
- 2. The user did not submit the report reflected by the COR.

STEERS allows users to submit corrections to some report types previously submitted to the TCEQ (DMR, IHW reports). Other report types (AEME, PST Self-certifications) require corrections to be submitted using paper copies. Therefore, users should not repudiate a STEERS submission due to incorrect data. Instead, the user would submit a corrected report, which generates a new COR if done using STEERS. In this manner, the entire history of the report, including the original COR and new CORs for all corrections will be maintained.

If the user did not submit the report represented by the COR, the user's signature device has been compromised. The user is required to immediately lock their account to prevent additional compromises and contact the TCEQ. After calling the TCEQ, the extent of the compromise will be assessed to determine whether any additional submissions need to be repudiated. The user and TCEQ will also investigate how the account may have become compromised in order to prevent future occurrences. For each COR that is determined to have been fraudulently submitted the TCEQ will take the appropriate action which may include removing the data from the database.

System Functions:

The system allows users to lock their own accounts in the event their signature has been compromised.

Supporting Documentation (list attachments):

11. Procedures to flag accidental submissions

Business Practices:

If a user determines that they accidentally submitted a report, the submission can be corrected with a follow-up submission, corrected by paper or repudiated. The preferred approach would be for the user to submit a correction (electronically or by paper). If the user would rather repudiate the submission, the user must contact the appropriate program area and discuss having the data removed from the database and contact the STEERS team to have the account locked until it can be further investigated.

System Functions:

STEERS provides multiple mechanisms to prevent accidental submissions:

- 1. STEERS performs a QA analysis on each report to validate that all required data points are provided. Only reports that pass the QA analysis can be submitted.
- 2. The report submission process uses a multi-step approach to reduce the likelihood of accidental submissions. At the time of signing, users confirm their intent to submit by providing their password on the verification page. Additionally, during the submission process:
 - a. Users must select the report(s) they intend to submit.
 - b. Users are given the opportunity to review the selected data in a read-only manner.
 - c. Users must use the mouse or tab key to confirm submittal, pressing the enter key will cancel the submittal process.
- 3. While it is unlikely that a user will proceed through the submission steps accidentally, in such a case, there are additional mechanisms in place for the user to realize they accidentally submitted a report and correct it:

- a. Submitters are sent an email after every submission.
- b. Users can review the CORs of all previous submissions using STEERS.

STEERS provides a mechanism for the user to lock his account if he believes it was used by someone else.

Supporting Documentation (list attachments):

CROMERR System Checklist

12. (e-signature cases only) Automatic acknowledgment of submission

Business Practices:

System Functions:

STEERS sends an acknowledgement email to the email address on file for the submitter after every submission. An email log is kept to track that the acknowledgement was sent. In addition, when possible confirmation emails are sent to other account holders with authorization for the same program area/site combination.

Supporting Documentation (list attachments):

CROMERR System Checklist

Signature Validation (e-signature cases only)

13. Credential validation (See 13a through 13c)

13a. Determination that credential is authentic

Business Practices:

System Functions:

STEERS will compare the user supplied password during the signing process to the encrypted form of the user's password stored in the database.

Supporting Documentation (list attachments):

13b. Determination of credential ownership **Business Practices: System Functions:** STEERS will compare the user supplied password during the signing process to the encrypted form of the user's password stored in the database. **Supporting Documentation (list attachments): CROMERR System Checklist** 13c. Determination that credential is not compromised **Business Practices:** Support staff monitor STEERS notifications of changed email addresses as well as questions asked by customers on the help line and in emails for suspicious activities. If it is determined that a compromise has occurred, the affected account will be locked, preventing the user from preparing, signing or submitting reports, and the user will be contacted to address the situation. **System Functions:** STEERS includes functions that allow STEERS support staff and users to detect credential compromises. See Item 15 for a description of these functions. STEERS allows a user to lock their account if they suspect their account has been compromised. Support staff also have the ability to lock any user's account. The fact that the account was not locked at the time the report was signed provides evidence that neither the user nor administrators believe the credential was compromised at that time. **Supporting Documentation (list attachments):** 14. Signatory authorization **Business Practices:** See Item #2 for the process STEERS support staff use to grant signatory authority to STEERS users. **System Functions:** The STEERS authorization system includes a "sign and submit" role that grants permission for a user to sign a report. This role is associated with a user and each program area/site combination for which they have signatory authority. STEERS uses the authorization system to determine whether a given user is authorized to submit a given report. **Supporting Documentation (list attachments):**

15. Procedures to flag spurious credential use

Business Practices:

Support staff monitor STEERS notifications of changed email addresses as well as questions asked by customers on the help line and in emails for suspicious activities. Examples of things that would trigger suspicion of a compromised account include, but are not limited to,

- a change of email address that appears to be for a different person (ie, <u>JohnSmith@io.com</u> to <u>EricJones@aol.com</u>),
- email or help line call in which a person says he is reporting for another person,
- email or help line call asking for the password to an account
- email or help line call asking a question about a report that was submitted by an account different than the person asking the question
- multiple failed login attempts

If it is determined that a compromise has occurred, the affected account will be locked, preventing the user from preparing, signing or submitting reports, and the user will be contacted to address the situation.

System Functions:

STEERS includes functions that allow STEERS support staff to detect the possibility that a user's device has been compromised:

- 1. Each time a user logs in to STEERS, the IP and date/time of the login is stored. Inconsistencies in the logins, such as different IP addresses may indicate a compromised password.
 - a. This information is tracked to be used in an investigation if appropriate.
- 2. STEERS will only allow a user to maintain a single concurrent STEERS session. If the user is already logged in, the previous login will be invalidated. If overlapping login attempts are frequently made, it may indicate a compromised password.
 - a. STEERS will also log failed login attempts. Repeated failed attempts for a specific account may indicate someone is trying to break into that account.

STEERS includes functions that allow STEERS users to detect the possibility that their account has been compromised. If it is determined that a compromise has occurred, the user is required to lock their account and notify the TCEQ.

- 1. After each report is submitted the submitter is sent an email acknowledging the submission.
- 2. After logging in to STEERS, a list of the user's previous logins is displayed, including the date/time of the login and the user is asked to confirm the logins were made by him.

STEERS provides additional credential protection throughout the lifetime of the account:

- 1. Users can change their password at any time using STEERS but they must successfully answer a randomly chosen challenge question first.
- 2. STEERS requires users to change their password at least once a year. Users must successfully answer a randomly chosen challenge question first.
- 3. An account is locked after 5 unsuccessful login attempts within a 24 hour period. Once locked, the account can not be used to log in to STEERS. The account holder must contact the TCEQ to get it unlocked.
- 4. Upon successful submittal, a confirmation message is displayed to the user as a part of the online session. In addition, a confirmation email is sent to the email address associated with the submitter's account.
- 5. When an AEME or IHW submittal is made, secondary emails are sent to other accounts that can report for the same program area/site combination informing them that a report was submitted and provide the confirmation number of the submitted report.
- 6. In order to change the email address associated with their account the user must be logged in which requires having successfully answered a randomly chosen challenge question.
- 7. STEERS has a session time-out limit of 20 minutes. This limit is reset when a user moves from page-to-page. The application checks that a user's session is active before displaying the next page. If a session is expired, the user is logged out and directed to the login page.

	Supporting Documentation (list attachments):	
	CROMERR System Checklist	
16	. Procedures to revoke/reject compromised credentials	
	Business Practices: Staff will lock a user's account if he observes evidence that indicates the account has been compromised. Evidence of a compromised account includes, but is not limited to: a call to the help line from a user who is using another person's account, a report of a compromised account from the account holder or someone else from the facility or a change in the account's email address that suggests the email is going to a different person than the account holder.	
	System Functions: Users are able to lock their account and STEERS support staff are able to lock any user's account.	
	At each logon, the system displays the user's previous 10 logons (date, time and IP address), asks the user to confirm these logons were made by him and requires the user to either click "yes" or "no" to answer the question. Confirming the logons were made by himself allows the user to proceed. Failure to confirm that all logons were made by himself results in locking the account and forcing the user to contact the STEERS team for assistance. A locked account can not be used to prepare, sign or submit any reports.	
	Supporting Documentation (list attachments):	
17. Confirmation of signature binding to document content		
	Business Practices:	
	System Functions: STEERS signatories will not use digital signatures to sign electronic documents. Instead, signers will use a password. The submission process is provided in Item 5. As described in the process, identifying account information from the signatory's account will be inserted into the COR of the submission to bind the signature to the document content.	

CROMERR System Checklist
Copy of Record
18. Creation of copy of record (See 18a through 18e)
18a. True and correct copy of document received
Business Practices:
System Functions: See Item 5 for the contents of the COR and the process used to assure it is a true and correct copy of the data.
Supporting Documentation (list attachments): Attachment 9 – examples of Copy of Record files
18b. Inclusion of electronic signatures
Business Practices:
System Functions: See Item 5 for the contents of the COR and information on how the electronic signature is included in the document.
Supporting Documentation (list attachments):
18c. Inclusion of date and time of receipt
Business Practices:
System Functions: STEERS includes the date and time of the submission in the COR. See Item 5 for more information on the contents of the COR.
Supporting Documentation (list attachments):

CROMERR System Checklist		
18d. Inclusion of other information necessary to record meaning of document		
Business Practices:		
System Functions: The COR is an XML document which uses XML tags to relate the user-supplied data to the context in which the data was provided. The file is understandable in its raw form, but can be displayed in a more appealing form using an XSL style sheet.		
Supporting Documentation (list attachments):		
18e. Ability to be viewed in human-readable format		
Business Practices:		
System Functions: See Item 9b and 9c for more information on how the COR is provided in a human-readable format.		
Supporting Documentation (list attachments):		
19. Timely availability of copy of record as needed		
Business Practices:		
System Functions: STEERS generates the COR during the submission process. The COR is available for review using STEERS by registrants with the authority to view CORs for the specified program area/site combination. Internal staff are also able to view CORs. STEERS will allow users to search for CORs on the following fields: 1. Submitter 2. Report type 3. Program area 4. Program area ID (site) 5. Date Range		
Users will be able to view the COR online and download the COR for offline review. The CORs will be searchable and viewable using STEERS for the entire length of time for which they are maintained in STEERS.		
Supporting Documentation (list attachments):		

CROMERR System Checklist

20. Maintenance of copy of record

Business Practices:

System Functions:

The system will maintain the COR in the database or file system. This database system is the Agency's Oracle production database environment. This database environment is a highly redundant database environment and the data in this environment is backed up with two different backup methods. One is a full database backup done weekly with an incremental backup done daily. The other is a full database data export which is done every three days. These backups are also stored offsite in a secure facility on a daily basis.

The COR will be maintained per the retention policy of the report type as shown below. At this time, the COR is stored in electronic format in an Oracle database. At some point in the future (to be determined), TCEQ will need to determine an alternate method to store the COR for this extended length of time.

- 1) Discharge Monitoring Reports 10 years
- 2) Air Emissions and Maintenance Events 30 years
- 3) Industrial Hazardous Waste Biennial Reports 30 years
- 4) TPDES (NPDES) General Permit Applications No Exposure Certification, Notice of Intent, Notice of Termination Permanently
- 5) Petroleum/Underground Storage Tank (UST/PST) Self Certifications 30 years
- 6) Air Emissions Inventory Phase 1 Bulk uploads, Air Emissions Inventory Phase 2 Interactive updates (Future December 2009 pending further funding) 10 years

Supporting Documentation (list attachments):

Data Report Enhancements

STEERS has been developed and built in such a manner that additional data reports may be added to the system with reduced effort. The security and CROMERR compliance concerns are implemented utilizing functions within STEERS that are shared by all existing data reports and future data reports are designed to adhere to those mechanisms. The mechanisms that STEERS uses to ensure the basic components of the rule are met will be utilized by the existing programs for existing reports and future reports. The TCEQ proposes to add reports under existing Programs as needs arise without further approval for those reports except in cases where the reports do not adhere to existing STEERS mechanisms or TCEQ business practices represented in this application/program.