CROMERR and Verify Light-Duty Request for Certificate Process

Light-Duty Manufacturer Webinar September 16, 2015





- Introduction
- CROMERR and the User Registration Process
- CROMERR and Light-Duty Certification
 - Uploading Certification Documents
 - Request for Certificate Process
- Demo of CROMERR Request for Certificate Process
- Deployment Information
- Next Steps
- Questions



CROMERR AND THE USER REGISTRATION PROCESS



Cross-Media Electronic Reporting Rule (CROMERR)

- What is CROMERR?
 - CROMERR (40 CFR Part 3) provides the framework for electronic reporting for all of the Environmental Protection Agency's (EPA) environmental regulations
 - CROMERR establishes standards for information systems that receive reports and other documents electronically
- Whom does it affect?
 - Regulated entities that submit reports and other documents to EPA under Title 40 of the Code of Federal Regulations
 - States, tribes, and local governments that are authorized to administer EPA programs under Title 40
- How does Verify implement CROMERR?
 - Verify implements CROMERR through its Request for Certificate Module
 - Applications are deemed final when a manufacturer submits a Request For Certificate (RFC)
 - An authorized "CROMERR Signer" must electronically sign that submission



CROMERR and Regulated Entities Reporting Directly to EPA

- Under CROMERR, electronic reporting directly to EPA requires submission through EPA's Central Data Exchange (CDX)
- Submissions must include valid electronic signatures in those cases where handwritten signatures would have been required for the paper-based submissions



CROMERR and Regulated Entities Reporting Directly to EPA

- <u>Valid Electronic Signature</u>: An electronic signature on an electronic document that has been created with an electronic signature device
 - Electronic signatures will have the same legal force as the handwritten signature
- <u>Signatory</u> An individual who is authorized to sign the document by virtue of his or her legal status or his or her relationship to the entity on whose behalf the signature is executed.
 - The signatory in Verify is called the CROMERR Signer



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Verify/CROMERR User Roles

Functional Roles	Description
Company Authorizing Official (CAO)	Individual(s) responsible for identifying, vouching for, and managing the "Verify Submitters" and "CROMERR Signers". Also referred to as the "Company Approving Official"
Verify Submitter	Submitters of application information to Verify's Light-Duty module
CROMERR Signer	Individual(s) taking legal responsibility for that final submission and/or requesting a certificate through the Request for Certificate module (Could be the same person as the Verify submitter)



What Your Company Needs to Do Starting September 23, 2015

- For Company Authorizing Official(s) (CAO), all manufacturers must:
 - 1. Have a Senior Manager identify the CAO(s) through a signed sponsor letter
 - Have the CAO(s) complete the latest versions of the CAO Electronic Signature Agreement(s) (ESA) and the User Information spreadsheet with the "Company Authorizing Official (CAO)" role selected
 - Mail the signed CAO Sponsor Letter, the CAO Electronic Signature Agreement(s) and the User Registration Information spreadsheet to the Verify Team



What Your Company Needs to Do Starting September 23, 2015

- For <u>new</u> Verify Submitter(s) only, the CAO will need to:
 - 1. Create a sponsor letter for the Verify Submitter
 - 2. Complete the User Information spreadsheet with the "Light-Duty" role selected
 - No Electronic Signature Agreement required for Verify Submitters
 - 3. Mail the signed Sponsor Letter and the User Information spreadsheet to the Verify Team
- No action needed for current LD Verify submitters



What Your Company Needs to Do Starting September 23, 2015

- In order to request a certificate, at least one user will need the CROMERR Signer Role. The CAO will need to:
 - 1. Create a sponsor letter for the CROMERR Signer
 - 2. Complete the User Information spreadsheet with the "CROMERR Signer" role selected
 - 3. Have user(s) complete a CROMERR Electronic Signature Agreement(s) (ESA)
 - 4. Mail the signed Sponsor Letter, the CROMERR Signer Electronic Signature Agreement(s) and the User Information spreadsheet to the Verify Team
- No action needed for current CROMERR Signers



CROMERR and Light-Duty Certification



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LD Certification Process Overview





My CDX

	Services	¢	8 Manage	
<u>Status</u>	<u>Program Service Name</u>	Role	¢	
8	VERIFY: Vehicles and Engines Compliance Information System	<u>Light-Duty</u>		Click on "Light-Duty" to enter the required certification datasets and documents
8	VERIFY: Vehicles and Engines Compliance Information System	Maintain Manufacturer Information		Click on "Maintain Manufacturer Information" to update addresses, contacts, etc.
8	Verify-RFC: Request an Engine, Vehicle or Component Certificate of Conformity (CROMERR)	<u>CROMERR Signer</u>		Click on "CROMERR Signer" to request a certificate. This requires a different CDX Role than the one required to submit light-duty certification information
8	VERIFY: Vehicles and <u>Upload C</u> Engines Compliance Information System	compliance Documents		Click on "Upload Compliance Documents" to submit non- certification compliance documents





About CDX MyCDX Inbox Change Password Frequently Asked Questions Help & Support CDX Home Terms & Conditions Logout

Verify: Engine and Vehicle Compliance System

MyCDX > Light-Duty Vehicle & Truck > Cert Home

Certification

- Carline
 - Start New Dataset
 - Open Existing Dataset
 - Submit Batch Dataset
 - Request Dataset Report

Evaporative/Refueling Family

- <u>Start New Dataset</u>
- Open Existing Dataset
- <u>Submit Batch Dataset</u>
- <u>Request Dataset Report</u>

Test Group

- <u>Start New Dataset</u>
- Open Existing Dataset
- <u>Submit Batch Dataset</u>
- <u>Request Dataset Report</u>
- <u>Request C SI Report</u>

Cortificate Request

- <u>Request Contificate</u>
- Submit Batch
- Request Dataset Report Request Pending Certificate Request
- Upload Certification Documents

<u>No</u> changes are being made to the light-duty Carline, Evaporative/Refueling or Test Group

XML schemas.

The Certificate Request link will now

be on the MyCDX screen (but only for the users from each company with the CROMERR Signer Role)

"Upload Certification Documents" will be a new link on the light-duty certification screen for uploading certification documents



Uploading Certification Documents



Uploading Certification Documents

About CDX MyCDX Inbox Change Password	<pre>* or * = required field + = CTRL-click to select multiple values</pre>	? H	elp
Frequently Asked Questions Help & Support CDX Home Terms & Conditions Logout	Use this page to submit your documents pertaining to generate individual ZIP files for larger files. Document Applicability* : Select Engine Family : 2017 Model Year*+ : 2017	al data or specific Engine Family data. You can upload multiple files at a time. ▼	
	2015 • Due to memory and file size constraints the total size of all t Document #1 Delete Document Type* : Select Confidentiality Status* : Select • 	re files to be uploaded should not exceed 100MB.	
	Local File : Choose File No file cho	sen Review & Subr	nit

- The Document Type pull-down list on this new screen will only include light-duty certification document types
- Multiple documents can be submitted in one submission. A different CDX In-Box message will be received for each document

Upload Certification Documents

Light-Duty Certification Documents (when applicable)

- ABT Credit Projection Report
- **Auxiliary Emissions Control Device** Information
- Application for Certification (CBI)
- Application for Certification (FOIA)
- CARB Executive Order
- CARB OBD Approval
- Certification Preview Meeting Information
- **Delegated Assembly Instructions**
- **Durability Process Application**
- **Durability Process Approval**
- **Durability Carry-Over/Carry-Across** Statement
- **Emission Control Information**

- HD-GHG 2b/3 Pre-Model Year Report
- Hardship Relief Request
- Hardship Relief Request Approval
- Installation Instructions
- **IRAF** (Infrequently Regenerating Adjustment Factor) Information
- LD-GHG Pre-Model Year Report
- EPA On-Board Diagnostics (OBD) Approval
- **On-Board Diagnostics (OBD)** _ Information
- **ORVR** Information
- Secondary Manufacturer Information
- Special Alternate Test Procedure₁₇



CROMERR Request for Certificate Process

- Prerequisites
 - The Test Group Dataset for the Test Group being certified must have been accepted by the system
 - All of the required documents must have been accepted by the system
 - Pass/Fail determination equals "Pass" for all test results
 - User submitting the Request for Certificate must have the "CROMERR Signer" Role



CROMERR Signer Role in Request for Certificate Module





Request for New Certificate

 Request a certificate for a Test Group that has not been previously certified

Request for Revised Certificate

Request a revised certificate for a certified Test Group where the information on the certificate has changed



Request for CSI Update

 Request a Certificate Summary Information (CSI) update for a certified Test Group where updates have been made to any LD dataset and/or certification documents

Delete Request for Certificate

 Delete a request for a certificate for a Test Group that has not been acted upon by EPA



Request for Certificate

- The CROMERR package is compiled when a request for certificate (or Revised Certificate) is made and includes:
 - Formatted CSI PDF report
 - Supporting certification documents
 - RFC Answers
 - Encrypted password hash
- There will be business rules in the post-certification datasets (FE Label, CAFE, IUVP, Roadload) that check to see that all updates are completed (Request for Revised Certificate or Request for CSI Update)

Request for CSI Update

- A Request for CSI Update:
 - Is required when changes are made to any of the following after a certificate has been issued:
 - LD Certification Datasets
 - Supporting certification documents
 - Replaces the current lock/unlock process
 - Should only be selected when nothing on the certificate has changed (otherwise use "Request for Revised Certificate")
 - Recompiles the CROMERR package with the updated information
- There will be business rules in the post-certification datasets (FE Label, CAFE, IUVP, Roadload) that check to see that all updates are completed (Request for Revised Certificate or Request for CSI Update)



Request for Certificate Demo



CDX Home About CDX Recent Announcements Terms and Conditions FAQs Help		
Central Data Exchange Last Login: 8/1 MyCDX Inbox My Profile Reg Maint Role Sponsorship Submission History	Contact Us 8/2014 9:46:58 AM	
Services News and Updates Manage Your Program Services No news/updates.		
Status Program Service Name Role(s) Verify-RFC: Request an Engine, Vehicle or Component Certificate of Conformity (CROMERR) Add Program Service CDX Help Desk: 888-890-1995 (970) 494-5500 for callers from Puerto Rico and Guam EPA Home About CDX Frequently Asked Questions Privacy and Security Notice Terms and Conditions Contact Us 	From the MyCE page of the company user the CROMERR Signer Role, se the "CROMERR Signer" link new the Verify-RFC	DX with lect R ct to



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Request for Certificate Process

	R	equest for	Certifica	te	
0	2	3	4	5	6
Identify	Documents	Statements	Confirm	e Signature	Complete
Process Code *		Request for N	ew Certificate		•
Industry *		Select Process Request for No Request for Re Reguest for C	s Code ew Certificate evised Certifica SI Update	ate	
in a soli j					
Model Year (YYYY)	•	Delete Reques	t for Certificat	8	



• Any validation errors will be displayed at the top of each screen.

EPA	VERIFY	ENGINE AND VEH	CLE TEM	My CDX	CDX Inbox	Welcome, SOMOZA4704! Manufacturer: EPA	Logou
		R	equest for	Certifica	te		
	0	2	3	4	5	6	
	Identify	Documents	Statements	Confirm	e Signature	Complete	
RFC-GE Family I RFC-GE does no	EN-BR007 - The Mo Name (RFC-5). EN-BR001 - The Cel ot exist in Verify fo	del Year (RFC-4) r rtification Informa or the selected Ind	nust match the m tion dataset for t lustry Name (RFC General In	odel year code he EPA Engine -3). formation	(first character	r) embedded in the EPA Ei FC-5) and Model Year (RF	ngine C-4)
	Process Code *		Request for N	ew Certificate		T	
	Process Code *		Request for N Heavy-Duty Hi	ew Certificate ghway Engine		•	
	Process Code * Industry * Model Year (YYYY)	*	Request for N Heavy-Duty Hi 2016	ew Certificate ghway Engine		•	



• Select all applicable certification documents and click "Next"

Θ	Review Indu	stry Information		- Cli	ck to Hide Information
	Process Code	Request for New Cert	ificate Industry	Heavy-Duty Highway Engine	
	Model Year	2015	EPA Engine Family Na	me FEPAH13.0ABD	
			Compliance Docume	ents	
	Select the docume	nt(s) below by clicking the che (descending). You car	ckbox or box area. Sort the document(s) i open the documents by clicking the file	by clicking the 🛦 up arrow (ascending) and the name or document title in bold text.	▼ down arrows
? F	ilter: Select D	ocument Type			
	File Name 🔺 🔻		Document Title 🔺 🔻	Document Type 🔺 🔻	Date 🔺 🔻
	AECD1.docx		US EPA General Applicability Comp Document Data	iance AECD REPORTING TEMPLATE	06/29/2015
	Del_assem1.de	ocx	US EPA General Applicability Comp Document Data	iance DELEGATED ASSEMBLY INSTRUCTIONS	06/29/2015
	ALT_Fuel1.doo	cx	US EPA General Applicability Comp Document Data	iance ALT FUEL CONVERSION DATA SUBMISSION FOR	I 06/29/2015 M
	ABT1.docx		US EPA General Applicability Comp Document Data	iance ABT CREDIT PROJECTION REPORT	06/29/2015
	NTE1.docx		US EPA General Applicability Comp Document Data	iance NTE DOCUMENTATION	06/29/2015
	Label1.docx		US EPA General Applicability Comp Document Data	iance SAMPLE LABEL LANGUAGE	06/29/2015
	warrantyl1.doo	cx	US EPA General Applicability Comp Document Data	iance WARRANTY STATEMEN	T 06/29/2015
•	CSI-FEPAH13.0)ABD.pdf	CSI-FEPAH13.0ABD.pdf	CSI REPORT	07/09/2015





 Provide the Introduction into Commerce Date, Agree to the Compliance statements and click "Review".

	Request for	Certifica	ate			
Identify Documen	3 ts Statements	4 Confirm	5 e Signature	6 Complete		
Review Industry Information Process Code Request for New Certin Model Year 2015	icate Industry EPA Engine Fam	Heav	/y-Duty Highway E \H13.0ABD	- Click to Hide Info	mation	
Review Compliance Documents	Compliance	Statements	5	+ Click to View Info	mation	The CARB
I. Introduction to Commerce Date CARB Executive Order Number						Executive Orde Number is only
 I unconditionally certify that this test group/ with the requirements of its corresponding. 	engine family/vehicle fa	amily/evaporative parts of the CFR	family complies and the Clean Air	I Agree		entered for California-Only



Review the information you provided and click "Sign and Submit" if • everything is correct.

		R	equest for	Certifica	ite			
	0-				5	6		
	Identify	Documents	Statements	Confirm	eSignature	Complete		
() RFC-COM (RFC-5/RI represen	IP-BR003 - Warnin FC-6) and Model \ tative for more in	g: There is an iss /ear (RFC-4) whic formation.	ue regarding the n may delay your (payment of the certificate requ	e certification fee lest. Please conta	for the EPA Eng Ict your EPA cer	ine Family Name tification	
			Review &	Confirm				
Industry	Information							This warning wil
Complia	nce Documents							doesn't have a
	nce Statements							record of the
1. Introd	uction to Commerc	e Date					07/20/2015	required fee
3. Lunco with th Act.	onditionally certify the requirements of	hat this test group/ its corresponding p	engine family/vehic part, other referenc	cle family/evapor ced parts of the	ative family compli CFR and the Clear	es 1 Air	l Agree	test group
								21



• Read the CROMERR Electronic Signature message and click "Accept" to continue.

Drresponding part, other re	ferenced parts of	the CFR and the Sa a
I certify, under penalty of law that	the information provided i	in this document is, to
the best of my knowledge and beli	ef, true, accurate, and co	omplete. I am aware
that there are significant penalties	for submitting false inform	mation, including the
possibility of fines and imprisonme	nt for knowing violations.	
	Decline	Accept



• You will need to provide your CDX password and answer one of your secret questions to sign your Certification package. Click "Sign".

gnature Widget		
1.Log in to CDX	2. Answer Secret Question	3.Sign File
User: SOMOZA4704	Question: Who is your favorite author?	Sign
Password:	Answer: allende	
Welcome Sandra Somoza	Correct Answer	





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- There will <u>not</u> be a light-duty manufacturer testing period for this release
- EPA will instead conduct a second manufacturer webinar in late October or early November to demo a testing version of the light-duty Request for Certificate module
 - The second webinar will be announced via a Verify listserver message as soon as it is scheduled

- The new Certification Document Upload and Light-Duty Request for Certificate modules will be deployed to production on Friday, December 4, 2015
- All light-duty Request for Certificate submissions (including requests for revised certificates) will need to be submitted via this new module beginning on Monday, December 7, 2015
- In preparation for this deployment, EPA must complete or deny all Request for Certificates by 3 PM EST on Thursday, December 3, 2015

- To increase the likelihood that your certificate requests are completed by December 3, 2015, submit them before Tuesday, November 24, 2015
 - However, even if a certificate request is submitted prior to November 24, 2015, EPA cannot guarantee that it will be completed prior to the deadline
- Any "denied" requests must then be resubmitted by the manufacturer after the new Request for Certificate module is deployed on Monday, December 7, 2015
 - To reiterate, if a new Certificate Request is required, no other datasets need to be resubmitted
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THITED STATES

Next Steps

- Beginning September 23, 2015 but no later than November 20, 2015 submit required CROMERR documentation for your company:
 - All required documents can be found on our website at: <u>http://www3.epa.gov/otaq/verify/setup.htm</u>
- Mail <u>complete</u> documentation to:
 - Verify Team
 OAR/OTAQ/CD
 US EPA, NVFEL
 2000 Traverwood Drive
 Ann Arbor, MI 48105

Information Sources

- Verify Website: www.epa.gov/otaq/verify
- Verify Listserver: <u>https://lists.epa.gov/read/all_forums/subscribe?name=verify</u>
- Manufacturer Guidance letters: <u>www.epa.gov/dis</u>
- For CROMERR and User Registration questions, please contact <u>helpdesk@epacdx.net</u>
- For Verify Request for Certificate questions, please contact: <u>verifyhelp@csc.com</u>



QUESTIONS