Marine CI Verify Module Deployment Meeting August 20, 2014



Agenda

- Introduction
- CROMERR Implementation
- Request a Manufacturer Code through Verify
- Marine CI User Registration
- Marine CI Certification Support Documentation
- Marine CI Demo
- Request for Certificate (RFC) Demo
- Information Sources
- Contact Information
- Questions
- Appendix RFC Process Information



Introduction

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CROMERR Implementation

Cross-Media Electronic Reporting (CROMERR)

What is CROMERR?

- CROMERR (40 CFR Part 3) provides the framework for electronic reporting under 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.



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.
- Electronic signatures will have the same legal force as the handwritten signature.
- Valid Electronic Signature: an electronic signature on an electronic document that has been created with an electronic signature device. A scanned document with a signature is not valid.
- Signatory 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.



Verify's Implementation of the CROMERR Process

Application for Certificate

- Applications are deemed final when a manufacturer submits a Request For Certificate (RFC)
- Authorized "CROMERR Signer" must electronically sign that submission
- Priority Reporting Documents
 - Any document submissions that require a signature, that are not part of the Application for Certificate
 - When any priority reports are submitted that are outside of the application process, they will be signed by the "CROMERR signer". (Note - this feature will not be available in this release of Verify)



Verify/CROMERR User Roles



Roles	Description
Verify Submitter	Submitters of Marine CI information to Verify
CROMERR Signer	Individual(s) taking legal responsibility for that final submission (Could be the same person as the Verify submitter)
Company Approving Official	Individual(s) responsible for identifying, vouching for, and managing the "Verify submitters" and "CROMERR signers"

CROMERR Signer Role in New RFC Module

The CROMERR Signer





Request a Manufacturer Code through Verify

Request a Manufacturer Code through Verify

- To submit to Verify you must have a manufacturer code existing in Verify.
- Currently, we have only identified four Marine CI manufacturers who do not currently have a manufacturer code in Verify.
- The latest instructions to get a manufacturer code are posted at http://www.epa.gov/otaq/verify/mfrcode.htm
- You can contact the Verify Helpdesk at verifyhelp@csc.com for additional assistance.





Marine CI User Registration Process

Marine CI User Registration Process

- There are three possible scenarios that a user may fall into with respect to registering for the Verify Marine CI or Request for Certificate modules. Each scenario has different requirements for completing registration.
 - Scenario 1 User currently has a Verify User Account and their manufacturer has previously submitted a CROMERR package.
 - Scenario 2 User does not have a Verify User Account but the manufacturer has submitted a CROMERR package for another Verify industry.
 - Scenario 3 User and manufacturer are new to Verify
- Detailed instructions for each of the scenarios is available on the web at http://www.epa.gov/otaq/verify/publications.htm

Scenario 1

- For Users requesting the Verify Submitter Role, the Company Authorizing Official (CAO) will need to:
 - 1. Create a sponsor letter for the Verify Submitter
 - 2. Complete the User Information spreadsheet with the Marine CI role selected
 - 3. Mail package to the Verify Team.
- For Users requesting the Request for Certificate CROMERR Signer Role, the CAO will need to:
 - 1. Create a sponsor letter for the Verify Submitter
 - 2. Complete the User Information spreadsheet with the Marine CI role and CROMERR Signer role selected
 - 3. Mail package to the Verify Team.

**The package should include the signed Sponsor Letter and the User Information spreadsheet

Scenario 2

- For Users requesting the Verify Submitter Role, the Company Authorizing Official (CAO) will need to:
 - 1. Create a sponsor letter for the Verify Submitter
 - 2. Complete the User Information spreadsheet with the Marine CI role selected
 - 3. Mail package to the Verify Team.
- For Users requesting the Request for Certificate 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 Marine CI role and CROMERR Signer role selected
 - 3. Have user complete an Electronic Signature Agreement (ESA)
 - 4. Mail package to the Verify Team.

**The package should include the signed Sponsor Letter, the User Information spreadsheet, and an Electronic Signature Agreement for any user requesting the CROMERR Signer role.



Scenario 3

- Determine if your manufacturer code is in Verify. If your code is not in Verify then you will need to request a manufacturer code.
- Identify your CAO and have a Senior Manager sponsor them.
 - 1. Create a sponsor letter for the CAO
 - 2. The CAO must complete a CAO ESA
 - 3. Mail the package to the Verify Team

**The package should include the signed CAO Sponsor Letter and the CAO Electronic Signature Agreement.

The CAO can follow the steps for Scenario 2 to register the manufacturer's Verify Submitter and Request for Certificate CROMERR Signer users.



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Streamlined Registration Process

- Verify is piloting a new streamlined registration process. The new process:
 - Reduces the number of paper packages that the manufacturer needs to mail to the Verify Team
 - Allows the manufacturer to directly manage their own users without involving EPA staff
- If your company is interested in participating in the pilot send an email to verify@epa.gov





Marine CI Certification Support Documentation

- Data Requirements
- Business Rules
- Standards Table
- XML Schema
- Configurations and Parts CSV Template
- Calculations Spreadsheet
- Request for Certificate Data Requirements
- Request for Certificate Business Rules









Request for Certificate Demo

Information Sources

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Verify Website: www.epa.gov/otaq/verify

Verify Listserver: https://lists.epa.gov/read/all_forums/subscri be?name=verify

Manufacturer Guidance letters: <u>www.epa.gov/dis</u>

Contact Information

- Telephone (888) 890-1995
 - CDX Help Desk
 - Option 4 for Verify Questions
- E-mail
 - verifyhelp@csc.com for technical questions regarding data or file acceptance
 - helpdesk@epacdx.net for help with your CDX registration (user ID/password) questions
- Questions regarding Marine CI applications
 - Contact your Certification Reviewer

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Appendix - RFC Process

- Prerequisites
 - Engine Family Dataset for the family being certified must have been accepted by the system
 - All of the required related to the documents must have been submitted
 - User must have the Verify Request for Certificate CROMERR Signer Role



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From Your MyCDX page select the link for the CROMERR Signer Role

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Select any documents that are related to the engine family. Certain documents may be required based on the details of the family you are certifying.



Enter the Introduction to Commerce Date and attest to any applicable Compliance Statements. If a statement does not apply to your engine

family select 'Not Applicable'.