

CROMERR and Electronic Reporting

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Sheri Duren / Utilities / Water Quality / Industrial Pretreatment

CROMERR

CROss Media Electronic Reporting Rule

40 CFR 3

The CROMERR provides the legal framework for electronic reporting under all of EPA's environmental regulations.

To receive electronic reports, a program must utilize CROMERR-approved software and request approval from EPA to insure they have the legal authority to receive electronic reports.

COB CROMERR Timeline

- 2018 – Purchased LinkoExchange (LE) and upgraded cloud-hosted Compliance-Tracking Software (CTS)
 - Linko staff began updating and converting existing data for transfer to cloud-based CTS and preparing tables for LE.
- 2018 - EPA HQ Approval
- 2019 - 2021 – COB-IPT Staff Changes / COVID
- 12/2021 – Training SIUs in using LE and they began double-reporting (submitting paper copies and using LE)
- 2022 – 2023 – Updated Ordinance
 - Major delays caused by more staff changes, multiple board approvals, attorney negotiations, City Council, etc.
- 03/2023 – EPA Region 8 – Approval of Major Modification
- **04/01/2023** – Began Receiving Electronic Reports without paper copies submitted – Began revising permits and enforcing E-Reporting.

Commercial-Off-The-Shelf (COTS)

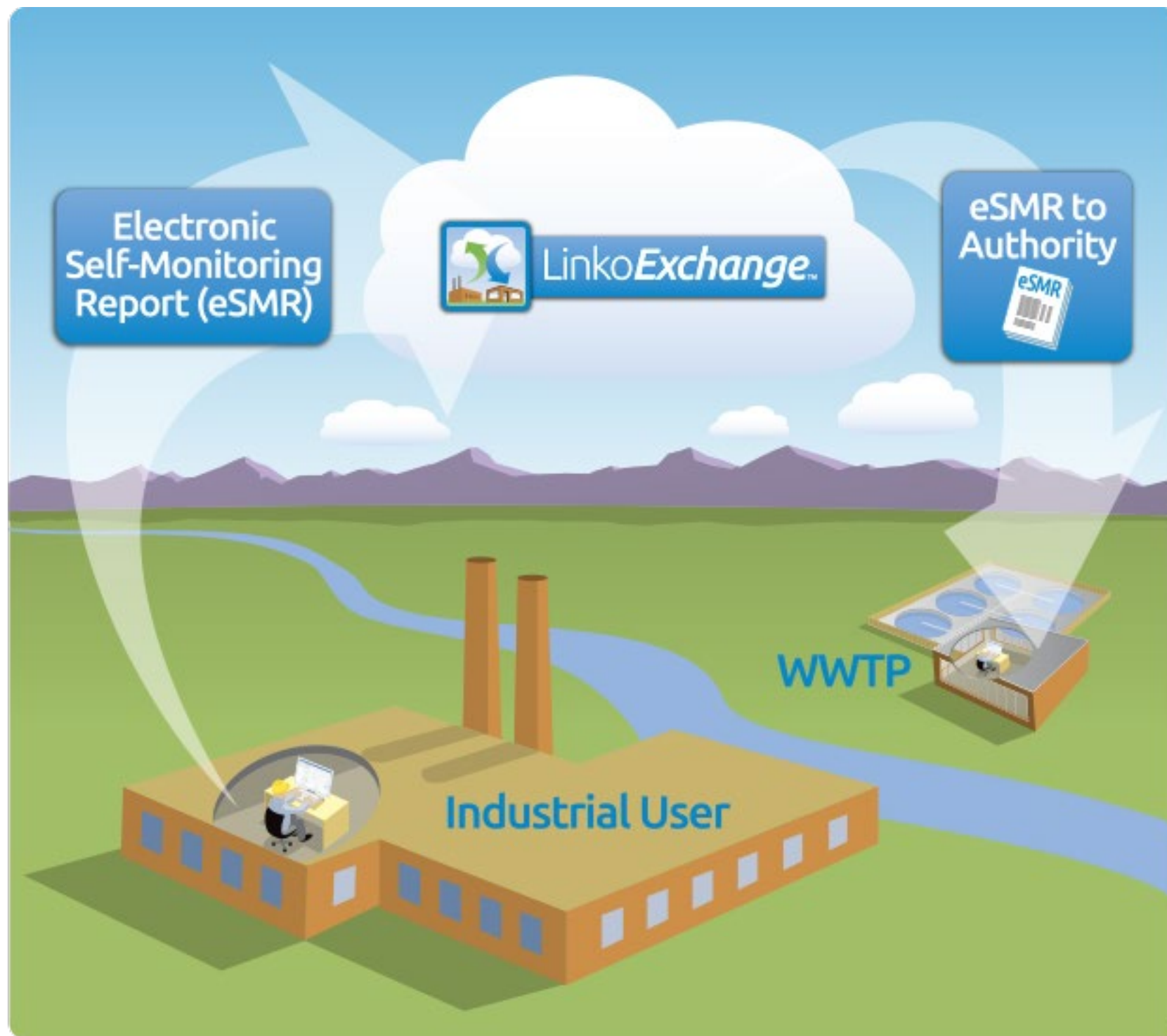


COTS Software Providers

- Aquatic Informatics – Linko Technology – LinkoExchange
- SwiftComply
- EPAs Central Data Exchange (CDX) Shared CROMERR Services (SCS)
- Others Not Listed Here

COB – COTS – Linko Exchange

The City of Boulder (COB) purchased LinkoExchange (LE) from Linko Technology because we already had a relationship with Linko Technology and owned their Compliance-Tracking Software (CTS) for many years.





Reasons for the Major Delays in Project

- One of first municipalities to seek approval but not first to get approval nationally. 1st in Colorado.
- COVID
- EPA-HQ – easy
- EPA Region 8
 - Update Sewer Use Ordinance
 - Advice from municipality with approval.
- COB – Staff Changes in Pretreatment & Attorney Office
- Ordinance hadn't been updated in many years, so we “edited” almost every section.
 - Added Definitions, CROMERR-related language, FOG, and corrected sections.
- Public Participation
 - Meetings with Stakeholders
 - Planning Board, Water Resources Advisory Board, and City Council

Items Added to Ordinance for CROMERR

Definitions

- Copy of Record
- Cross-Media Electronic Reporting (CROMERR)
- Electronic Document
- Electronic Document Receiving System
- Electronic Signature
- Electronic Signature Agreement
- Electronic Signature Device
- Transmit
- Valid Electronic Signature

SIU Reporting

No SIU shall fail to transmit reports by electronic means by a designated electronic document receiving system that satisfies the requirements of CROMERR set forth in 40 CFR 3, including but not limited to the electronic signature agreement requirement, and verified with a valid electronic signature to develop a copy of record.

Approval Process



Decide on Software

- Compare Features
 - Will it work with existing systems?
 - What will need to be upgraded?
- Purchase
- Begin Training Staff & SIUs



CROMERR Application to EPA

- CROMERR Application Cover Sheet
- Legal Authority Certification from City Attorney Office
- Vendor-Specific Checklist Template for:
 - System Functions
 - Business Processes
- Electronic Signature Agreement



Region 8 Approval

- Begin updating ordinance.
- Work with EPA Region 8 to submit a Major Modification Package
- Begin Receiving Electronic Reports

Measuring Progress

Good

Bad

Ugly

City

- No More Data Entry
- Fewer Errors
- Compliance Checked Immediately
- Less Paper
- More Data
- Software Stays Updated
- No Cost to SIUs

- Lots of Emails from LE
- Accept or Deny Submittal
- Getting permit to match what is needed.
- Only for Permitted SIUs and long-term dischargers

- Training SIUs who aren't technically savvy.
- Working with SIU hesitancy.
- Unlocking SIU accounts when they lock themselves out.
- Expensive

Industry

- Submit up to the deadline.
- Submit anywhere.
- Automatic Confirmation
- Less Paper
- Easier to Submit More Data
- Easy for backup person to submit.

- Must work with contract lab to get Electronic Data Deliverable in correct format or fix for upload.
- Some IUs are technically challenged.

- SIUs lock themselves out of account by not remembering password
 - Must wait on IPT staff to unlock them.
- Not conducive for FOG or Dental – use fax.

Compliance Challenges

Laboratory Information System (LIMS)

- Our in-house Wastewater Environmental Laboratory changed LIMS during this change.
- Import from LIMS to CTS

Compliance Checks

- Must check for compliance more often to ensure that:
 - In-house lab data has been imported
 - Contract lab data has been imported
- Check SNC quarterly after all the data as been imported.
- LE sends a daily compliance email noting any violations.

Contract Labs

- Must work with contract lab to develop custom EDD or
- Do it ourself
- Import into CTS

Conclusion

Expensive and took a long time to get up and running, however it saves us about 1/3 of an FTE. So, it's a benefit to our program and the SIUs.

Contact me with any questions.

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- Application Package to EPA-HQ
- EPA Region 8 Approval

2

- Utilize Attorney Office for certification and updating ordinance.
- Public Participation

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- Train staff
 - Train SIUs
 - Continually assist SIUs
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