

## DOES CROMERR APPLY TO YOUR E-REPORTING SYSTEM?

### *Questions for States, Tribes, and Local Governments to Ask\**

1. Does the system receive submissions from facilities you regulate via computer-to-computer transmission?
  - If **yes**, go to 2.
  - If **no**, CROMERR does not apply.\*

**NOTE:** Answer **yes** if you receive submissions through any sort of telecommunications network, even as email attachments. Answer **no** if all you receive are faxes, or submissions on magnetic or optical media (diskettes, tapes, CDs, DVDs, etc.).

2. Do facilities make at least some of the submissions to satisfy requirements of an EPA-authorized program? (An “EPA-authorized program” is one that EPA authorizes, approves or delegates to you under a Title 40 regulation.)
  - If **yes**, go to 3.
  - If **no**, CROMERR does not apply.\*

**NOTE:** Answer **no** if all the reports are required only under your own authority, and are not a part of any program that involves EPA oversight or approval.

3. Are the computer-to-computer transmissions accepted in lieu of paper submissions, or must the submitters provide the same information on paper submittals?
  - If **no paper is required**, CROMERR applies.\*
  - If **some paper is still required**, go to 4.
4. Do you require a complete paper copy of the electronic submission – including any original, ink-on-paper signature that the paper report normally includes – or do you require only certain elements of the report on paper?
  - If you **require only certain elements on paper**, CROMERR applies.\*
  - If you **require a complete paper copy – including any original, ink-on-paper signature that the paper report normally includes** – CROMERR does not apply.\*

**NOTE:** CROMERR will apply even if there is no electronic signature, as long as some of the report elements are submitted only electronically.

**\*This document does not stand in place of regulation; any actual or apparent disagreement between this document and the regulation can only be resolved through consultation with EPA.**