



Oklahoma Department of Environmental Quality CROMERR Success Story

On September 26, 2008, the Oklahoma Department of Environmental Quality (OKDEQ) received official approval from EPA, under the Cross-Media Electronic Reporting Regulation (CROMERR), for modifications/revisions to multiple authorized programs to allow electronic reporting for their Electronic Document Receiving System (ERDS). EPA announced its approval in a *Federal Register* notice published shortly thereafter (73 FR 58587, October 7, 2008). OKDEQ submitted a consolidated CROMERR compliance application covering program modifications and revisions for multiple authorized programs under 40 CFR for air, waste and water programs, including existing electronic document receiving systems that accept reports with electronic signatures and "priority reports". OKDEQ used a unified approach to meet CROMERR requirements that encompasses all applications and programs within an entity that is operating delegated programs. Under this approach, compliance with the requirements of CROMERR becomes a single, unified, and consistent effort, independent of the various programs and their supportive software applications. This approach provides a number of advantages, including lower cost, faster implementation, and a single compliance infrastructure to understand, support, and maintain. EDRS is designed to be an agency-wide system, extensible to any and all program areas.

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The Oklahoma Solution to Meeting CROMERR Requirements

OKDEQ developed and implemented the ERDS as an organization-independent, complete solution to the receipt of electronic documents. ERDS is a web portal based document management system that provides repository, management auditing and retrieval features through an intuitive, easy to learn but highly secure user interface. OKDEQ also incorporated advanced workflow, routing, and application integration features into their system. EDRS uses a public key infrastructure (PKI) based signature approach, including the use of a challenge question and response methodology intended to obtain signature validations required under the rule. Representatives of regulated entities, usually referred to as signatories, navigate to the portal, sign in, answer questions that validate their identity, and submit digitally signed documents to the system. These documents are then validated, stored, and routed to the appropriate authority within the agency for acceptance or rejection.