



# **CROMERR & Verify's New Request for Certificate (RFC) Module**

NRCI and Locomotive Manufacturer Webinar  
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# **APPENDIX – CROMERR REQUIREMENTS**



# 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



# Cross-Media Electronic Reporting Rule (CROMERR)

- 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
    - Electronic signatures will have the same legal force as the handwritten signature
    - The CROMERR Signer is 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



# Summary of Required CROMERR Documents

Verify Functional Roles	Description	Verify CROMERR Company Authorizing Official (CAO) Sponsor Letter	Verify Company Authorizing Official (CAO) Electronic Signature Agreement (ESA)	Verify CROMERR User Sponsor Letter (Submitters) and Signers)	Verify CROMERR Signer Electronic Signature Agreement (ESA)	Verify User Registration Information Spreadsheet
<a href="#">Company Authorizing Official (CAO)</a>	Individual(s) responsible for identifying, vouching for, and managing the “Verify Submitters” and “CROMERR Signers”. Also referred to as the “Company Approving Official”	X	X	--	--	X
<a href="#">Verify Submitter</a>	Submitters of certification and compliance information to Verify except for requests for certificates of conformity	--	--	X	--	X
<a href="#">CROMERR Signer</a>	Individual(s) taking legal responsibility for all of the information used as the basis for a request for certificate through the Request for Certificate module (Could be the same person as the Verify submitter)	--	--	X	X	X



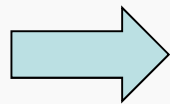
## What All Companies Need to Do: Company Authorizing Official (CAO)

1. A Senior Manager must identify the CAO(s) through a signed Verify CAO sponsor letter signed by the Senior Manager
  - A CAO cannot sponsor themselves, it must be another senior manager within the company or notarized if the CAO is the senior manager within the company
2. Each CAO must complete the latest version of the Verify CAO Electronic Signature Agreement(s) (ESA)
3. Each CAO must complete the latest version of the Verify User Registration Information spreadsheet with all applicable Verify roles, including the new “Company Authorizing Official (CAO)” Verify role, selected
4. Once complete, mail all documents to the Verify Team



## What All Companies Need to Do: CROMERR Signer

1. The CAO must identify the CROMERR Signer(s) through a signed Verify CROMERR User Sponsor Letter  
-CAOs can also be CROMERR Signers and can sponsor themselves for this role with the Verify CROMERR User Sponsor Letter
2. Each CROMERR Signer must complete the Verify User Registration Information spreadsheet with the “CROMERR Signer” role selected
3. Each CROMERR Signer must complete a Verify CROMERR Signer Electronic Signature Agreement (ESA)
4. Once complete, mail all documents to the Verify Team

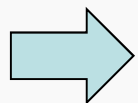


**In order to request a certificate, at least one user for your company must have the new CROMERR Signer Role which will allow them to request certificates for any industry already using the new RFC module.**



## What All Companies Need to Do: Verify Submitters

1. The CAO must identify the Verify Submitter(s) through a signed Verify CROMERR User Sponsor Letter
  - CAOs can also be Verify Submitters and can sponsor themselves for this role with the Verify CROMERR User Sponsor Letter
2. Each Verify Submitter must complete the Verify User Registration Information spreadsheet with the applicable industry role selected
  - An Electronic Signature Agreement is not required for Verify Submitters
3. Once complete, mail all documents to the Verify Team



**No action is needed for current Verify submitters**