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

NRCI and Locomotive Manufacturer Webinar June 2016



Agenda

- Important NRCI & Locomotive Dates
- CROMERR and the User Registration Process
- CROMERR and Certification
 - Overview of Process
 - MyCDX
 - Maintain Manufacturer Information
 - Uploading Certification Documents
 - Request for Certificate Process
- Demo of CROMERR Request for Certificate Process
- Questions
- Appendix: CROMERR Requirements
- Appendix: Sample CDX CRK Letters



IMPORTANT DATES



Important NRCI RFC Dates

			July 2016			
Mon	Tues	Wed	Thurs	Fri	Sat	Sun
11	12	13	14	15 Deadline for Submitting NRCI CROMERR Paperwork	16	17
		F	August 2010	6		
1	2 Second NRCI Manufacturer RFC Webinar	3	4 All NRCI Certificate Requests Must Be Issued or "Denied"	5 Verify System Down @ 5 PM EST for New NRCI RFC Module Deployment	6 Verify System Down for Deployment	7 Verify System Down for Deployment
8 Verify System & NRCI RFC Module Available @ 8 AM EST	9	10	11	12	13	14



NRCI Deployment Information

- Submit NRCI CROMERR documentation by 07/15/2016 to increase likelihood that the CROMERR signer role will be added to the user's Verify account in order to be able to request certificates
- EPA must complete or "deny" all pending NRCI certificate requests on 08/04/2016 in preparation for deployment of new RFC module
 - Any NRCI certificate requests denied by EPA must be resubmitted by the manufacturer using the new RFC module beginning on 08/08/2016
- Beginning Monday 08/08/2016 all NRCI certificate requests (New, Revised, CSI Updates) can only be submitted using the new RFC Module by the CROMERR signer
 - IMPORTANT- Only CROMERR Signers who have completed the Verify registration process will be able to see and access the new RFC module



Tentative Locomotive Dates

		Se	ptember 20	16		
Mon	Tues	Wed	Thurs	Fri	Sat	Sun
5	6	7	8	9 Deadline for submitting LOCO CROMERR paperwork	10	11
		Septen	nber/Octobe	er 2016		
26	27 Second LOCO Manufacturer RFC Webinar	28	29 All LOCO Certificate Requests Must Be Issued Or "Denied" by EPA	30 Verify System Down @ 5 PM EST for New LOCO RFC Module Deployment	1 Verify System Down during Deployment	2 Verify System Down during Deployment
3 LOCO RFC Module Ready To Use @ 8 AM EST	4	5	6	7	8	9



Locomotive Deployment Information

- Submit LOCO CROMERR documentation by 09/09/2016 to increase likelihood that the CROMERR signer role will be added to the user's Verify account in order to be able to request certificates
- EPA must complete or "deny" all pending LOCO certificate requests on 09/29/2016 in preparation for deployment of new RFC module
 - Any LOCO certificate requests denied by EPA must be resubmitted by the manufacturer using the new RFC module beginning on Monday, 10/03/2016
- Beginning Monday 10/03/2016 all LOCO certificate requests (New, Revised, CSI Updates) can only be submitted using the new RFC Module by the CROMERR signer
 - IMPORTANT- Only CROMERR Signers who have completed the Verify registration process will be able to see and access the new RFC module



CROMERR AND THE USER REGISTRATION PROCESS



Verify/CROMERR User Roles

 All manufacturers must submit documentation to EPA for the following:

Functional Roles	Description
Company Authorizing Official (CAO)	Identifies, vouches for, and manages the "Verify Submitters" and "CROMERR Signers"
Verify Submitter	Submits certification and compliance information to Verify (not including certificate requests)
CROMERR Signer	Takes legal responsibility for all of the information used as the basis for a request for certificate



Submitting CROMERR Documentation

- Submit required CROMERR documentation before the deadlines in order to be able to request certificates using the new RFC module
- Mail <u>complete</u> hard-copy CROMERR documentation to: Verify Team

c/o CGI Federal, Inc.

12601 Fair Lakes Circle

Fairfax, VA 22033



What All Companies Need to Do:

Required CROMERR Paperwork

1. To establish CAOs:

- An updated version of the Verify CAO Electronic Signature Agreement(s) (ESA)
- The Verify User Registration Information spreadsheet with all applicable Verify roles selected for the CAO, including the new "Company Authorizing Official (CAO)" Verify role

2. To establish <u>CROMERR Signer(s)</u>:

- Your company's CAO must submit a signed Verify CROMERR User Sponsor Letter for each new CROMERR Signer
- Each CROMERR Signer must complete a unique Verify CROMERR Signer Electronic Signature Agreement (ESA)
- Each CROMERR Signer must complete the Verify User Registration Information spreadsheet with the "CROMERR Signer" role selected

3. To establish new Verify Submitters:

- Your company's CAO must submit a signed Verify CROMERR User Sponsor Letter for each new Verify Submitter
- Each Verify Submitter must complete the Verify User Registration Information spreadsheet with the applicable industry role(s) selected



Verify User Registration & CROMERR Process

- EPA reviews all user registration materials for completeness
- The submitter will be notified of any missing/incomplete items
- Once the complete user registration package is received, the CDX Helpdesk (helpdesk@epacdx.net) will send any new users an email, which will contain Pre-registration Customer Retrieval Key (CRK) to access Verify. Follow the instructions of the letter (sample letters are in the appendix)
 - The CRK will expire in 90 days so complete the registration process ASAP
 - Do not forward your CRK to another user or you will be locked out of CDX.



Verify User Registration & CROMERR Process

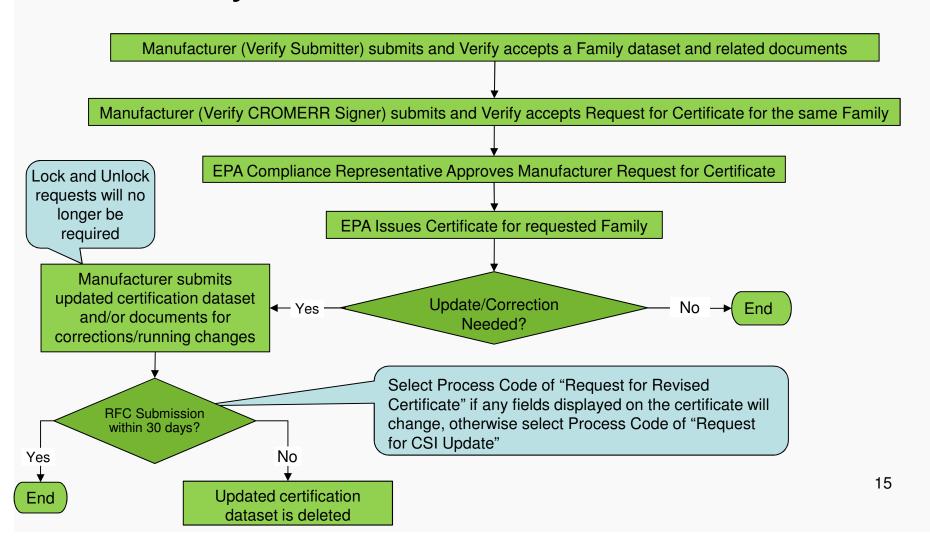
- Existing Verify users getting the new CROMERR Signer Role:
 - Once the CROMERR Signer role (or any other new role) is assigned and has been added to your profile, you will receive an email from the CDX helpdesk
 - Upon first log in after the new CROMERR signer role has been added, the user will be required to establish security questions/answers that will be needed during the certificate request process
- To ensure that these notifications aren't filtered as spam/junk mail, please add <u>helpdesk@epacdx.net</u> to your address book/contact list



CROMERR and Certification



Verify Certification Process Overview





	Services	¢¢ Manage	
<u>Status</u>	Program Service Name ◆	<u>Role</u>	
<u>&</u>	VERIFY: Vehicles and Engines Compliance Information System	Certification Module: Electric-MC, Portable Fuel Containers, Snowmobile, HD-Evap, HD- Engine CFF	
8	VERIFY: Vehicles and Engines Compliance Information System	Heavy-Duty Highway Gas and Diesel Engines	
8	VERIFY: Vehicles and Engines Compliance Information System	Heavy-Duty Highway Tractors and Vocational Vehicles	
8	VERIFY: Vehicles and Engines Compliance Information System	Non-Road Compression Ignition	
<u>&</u>	VERIFY: Vehicles and Engines Compliance Information System	Light-Duty	
<u>&</u>	VERIFY: Vehicles and Engines Compliance Information System	Locomotive	
8	VERIFY: Vehicles and Engines Compliance Information System	Maintain Manufacturer Information	
8	VERIFY: Vehicles and Engines Compliance Information System	Marine Compression Ignition	
<u>&</u>	VERIFY: Vehicles and Engines Compliance Information System	Non-Road Spark Ignition	
<u>&</u>	VERIFY: Vehicles and Engines Compliance Information System	<u>Upload Compliance Documents</u>	
&	Verify-RFC: Request an Engine, Vehicle or Component Certificate of Conformity (CROMERR)	CROMERR Signer	



"My CDX" Verify Roles



Click on the applicable industry to submit the required certification datasets and documents



Click on "Maintain Manufacturer Information" to update industries, addresses, contacts, etc.



Click on "Upload Compliance Documents" to submit non-certification compliance documents



Click on "CROMERR Signer" to request a certificate.

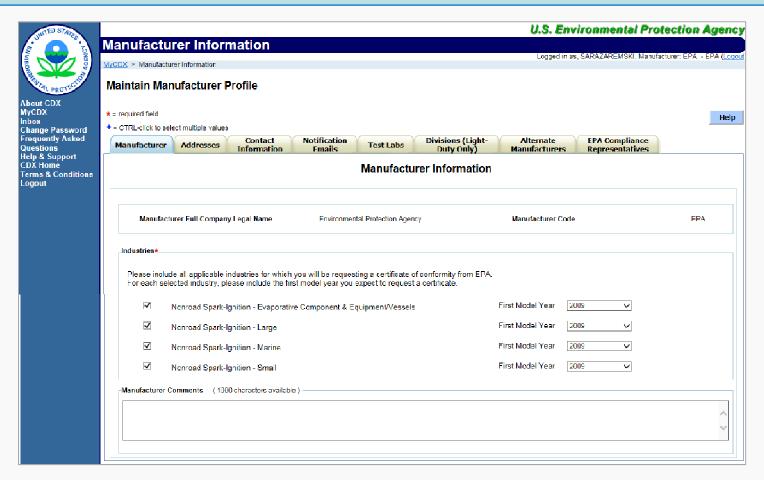




- Each company is responsible for keeping all of the information in Verify's "Maintain Manufacturer Information" module complete and up-to-date
 - Add any new or missing industries, addresses, contacts, test labs, notification emails, etc
 - Inactivate any obsolete addresses, contacts, test labs, etc
- EPA certification engineers rely on this information
- A special Verify role is needed for "Maintain Manufacturer Information", otherwise users will only have access to "View Manufacturer Information" for their Manufacturer Code

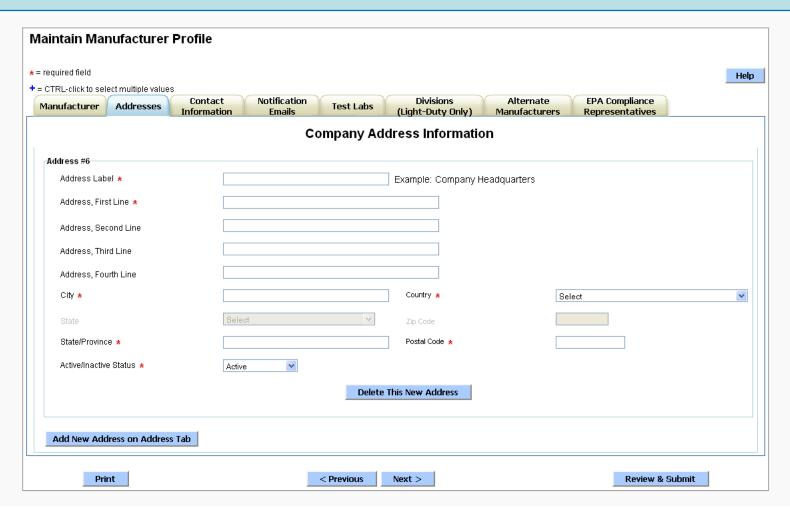


 The appropriate industry sector(s) must be selected as industries on this tab in order to submit requests for certificates



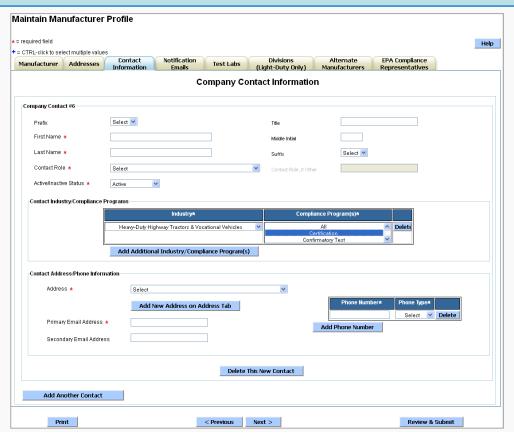


 All company addresses must be entered on this tab in order to submit requests for certificates



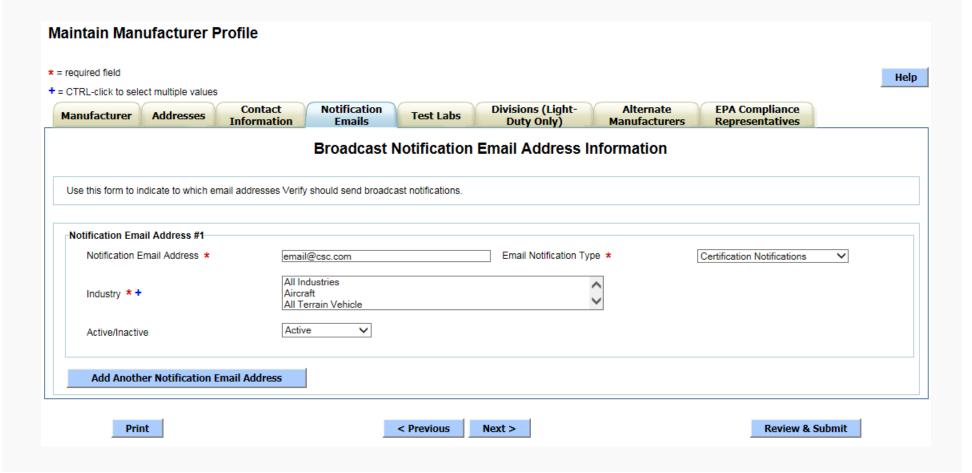


- All company contacts must be entered (or inactivated) on this tab with the applicable industries selected for each contact.
- An industry will not appear in the RFC pull-down unless the CROMERR Signer is specified as a contact here for that industry.





 All company contacts must be entered (or inactivated) on this tab in order to submit requests for certificates





Uploading Certification Documents



Uploading Family Datasets & Certification Documents

- The "Request for Certificate" link has been removed from each industry home screen and is instead on the MyCDX page (for CROMERR Signers only)
- The "Upload Compliance Documents" link has been renamed to "Upload Certification Documents"



About CDX
MyCDX
Inbox
Change Password
Frequently Asked
Questions
Help & Support
CDX Home
Terms & Conditions
Logout

Verify: Engine and Vehicle Compliance System

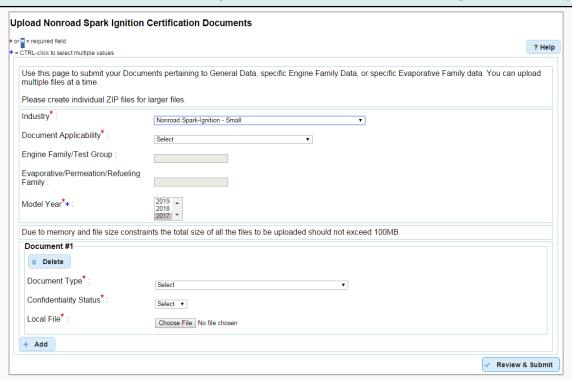
MyCDX > Nonroad Spark Ignition

- Upload Nonroad SI Certification Documents
- Nonroad SI Evaporative Components/Equipment
- Small SI Engine Family
- Large SI Engine Family
- Marine SI Engine Family



Uploading Certification Documents

- The Document Type pull-down list on this screen will only include certification document types for the applicable industry (upload non-certification documents from the Upload Compliance Documents link on the MyCDX page)
- All certification documents for a family must be uploaded before the RFC can be submitted (but do not have to be uploaded before the Engine Family dataset)





NRCI Certification Documents

- Required documents are indicated in bold and with an asterisk (*). The
 other documents are either optional or conditionally required (see the
 NRCI Data Requirements and Business Rule documents for details).
 - ✓ ABT (Averaging, Banking and Trading)
 Projection
 - ✓ AECD (Auxiliary Emissions Control Device) Information
 - ✓ Aftertreatment Details
 - ✓ Alternative Useful Life Information
 - ✓ Bond Worksheet
 - ✓ CARB Executive Order
 - ✓ Deficiency Description Document
 - ✓ Delegated Assembly Information
 - **★ *Durability/Deterioration Factor Information**

- ✓ Emission Control Information
- ✓ *Installation Instructions
- ✓ IRAF (Infrequent Regeneration Adjustment Factor) Information
- ✓ Limited Testing Region Information
- √ *Maintenance Instructions
- √ *NTE (Not to Exceed) Documentation
- √ *Sample Label Language
- ✓ Special/Alternate Test Procedure
- ✓ Tamper Proof Mechanism Description for Adjustable Parameters 26



CROMERR Request for Certificate Process



Prerequisites

- The full amount of the certification fee is paid for the Family
- The Family Dataset for the Family being certified must have been accepted by the system
- All of the required documents must have been accepted by the system
- Pass/Fail determination must equal "Pass" for all test results
- User submitting the Request for Certificate must have the "CROMERR Signer" Role in Verify



CROMERR Signer Role in Request for Certificate Module

The CROMERR Signer

Request

Makes the Request for Certificate or CSI Update

Review

- Reviews the application and related documents that have been submitted through Verify
- Determines completeness

Attest

Attests that the submission is true and accurate

Sign

• Electronically signs the request for certificate



Request for Certificate – CROMERR Package

- The CROMERR package is compiled and stored in the CROMERR Archive when a Request for Certificate (or Revised Certificate) is completed and includes:
 - Formatted Certificate Summary Information (CSI) PDF report
 - Supporting certification documents
 - RFC Compliance Statement Answers
 - Encrypted electronic signature information
- A link to the CROMERR package will be sent to the CROMERR signer's CDX in-box



Request for New Certificate

Request a certificate for a Family that has not been previously certified

Request for Revised Certificate

Request a revised certificate for a certified Family if any fields displayed on the certificate have changed

Request for CSI Update

Request a Certificate Summary Information (CSI) update for a certified Family where updates have been made to the Family dataset and/or certification documents but no changes to any fields displayed on the certificate

Delete Request for Certificate

Delete a request for a certificate (only for a Family that has not been acted upon by EPA)



Post-Certification Updates

- Any updates to either the family dataset or supporting certification documents must be completed by submitting a Request for CSI Update or Request for Revised Certificate as applicable
 - CDX in-box notifications will remind the CROMERR Signer who submitted the original request for certificate to complete the required update
 - If a Request for Revised Certificate or Request for CSI Update are not completed by the required date, the family updates will be deleted
 - Submitting the applicable request recompiles the CROMERR package with the updated information

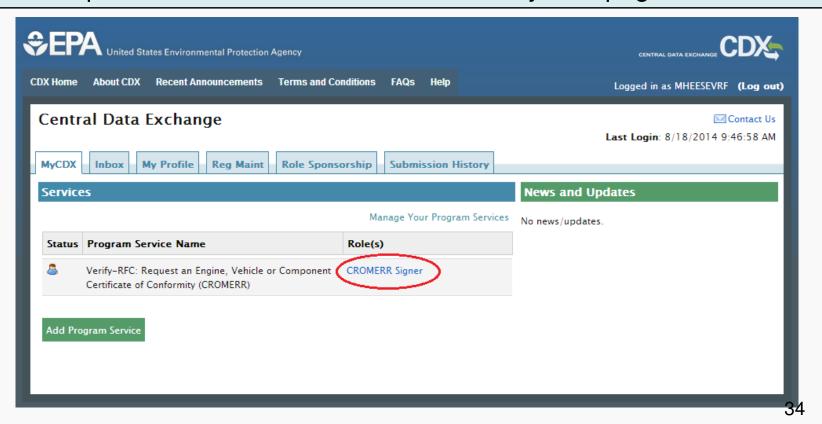
32



CROMERR Request for Certificate Screenshots

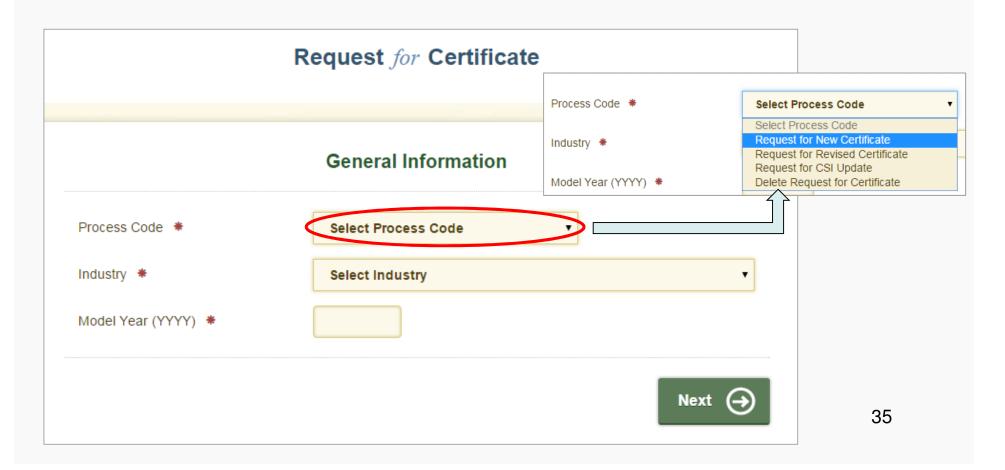


 Only Verify users with the CROMERR Signer role will have the link to the Request for Certificate module on their MyCDX page





Select the applicable Process Code for this submission



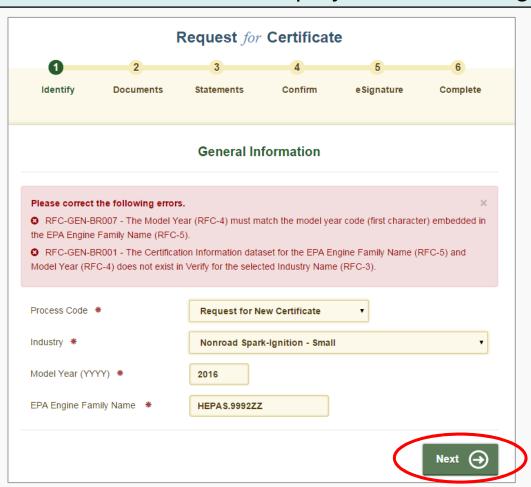


 When Process Code and Industry are selected, the Request for Certificate progress status bar will appear and the fields displayed on the screen will change as applicable

0	2	3	4	5	6
Identify	Documents	Statements	Confirm	eSignature	Complete
		General In	formation		
Process Code	*	Request for N	ew Certificate	•	
Industry *		Nonroad Spar	k-Ignition - Small	•	
Model Year (YY	YY) *				
EPA Engine Fan	nily Name *				



Applicable validation errors will be displayed after clicking on "Next"





Click "Next" again after addressing any errors on the screen

Request for Certificate						
0	2	3	4	5	6	
Identify	Documents	Statements	Confirm	eSignature	Complete	
		General In	formation			
Process Code *		Request for New Certificate ▼				
Industry *		Nonroad Spar	k-Ignition - Small	¥		
Model Year (YY	YY) *	2017				
EPA Engine Far	mily Name *	HEPAS.9992ZZ	1			
					Next 🕣	



 Click the minus sign ("-") to hide the fields from previous screens. Click the plus sign ("+") to display the information again

Request for Certificate						
	O		3	4	5	6
	Identify	Documents	Statements	Confirm	eSignature	Complete
Review Inc	dustry Informa	tion				Hide
Process Code				Industry		
Request fo	r New Certificate			Nonroad Spark	-Ignition - Small	
Model Year				EPA Engine Family	/ Name	
2017				HEPAS.9992ZZ		
			Certification	Documents		
elect the doci					y clicking the ▲ up arrow name or document title in	v (ascending) and the ▼ dow bold text.
Filter	Select Docume	nt Type 🔻				
File Name	• 🛦		Document Title ▲		Document Type ▲	Date ▲
NRSI Bo	ond-Small-ZZ.docx		EPA2017Complia DataHEPAS.9992		Bond Worksheet	01/26/2016
	-Small-ZZ.docx		EPA2017Complia	nce Document	Durability/Deterioration	01/26/2016

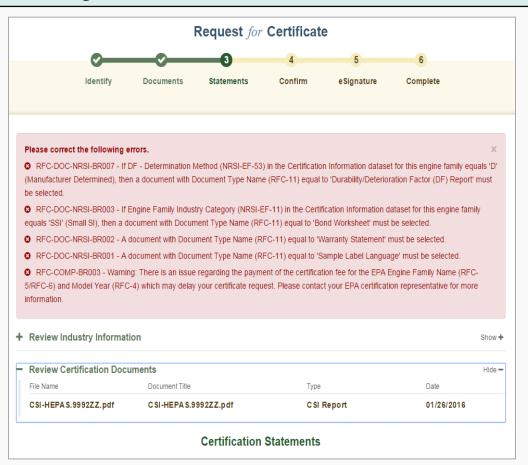


 All certification documents submitted for the family name entered on the previous screen as well as "General Applicability" documents for the same industry and model year will be displayed on this screen. Select all applicable documents for this family and click "Next".

	Certification Documents					
Select the do	Select the document(s) below by clicking the checkbox or box area. Sort the document(s) by clicking the ▲ up arrow (ascending) and the ▼ down arrows (descending). You can open the documents by clicking the file name or document title in bold text.					
⊘ Filter	Select Document Type v					
File Nar	me 🛦	Document Title ▲	Document Type ▲	Date ▲		
NRSI E	Bond-Small-ZZ.docx	EPA2017Compliance Document DataHEPAS.9992ZZ	Bond Worksheet	01/26/2016		
IRSI [DF-Small-ZZ.docx	EPA2017Compliance Document DataHEPAS.9992ZZ	Durability/Deterioration Factor (DF) Report	01/26/2016		
IRSI \	Warranty.docx	EPA General Applicability Compliance Document Data	Warranty Statement	01/21/2016		
NRSI S	Sample Label-NRSI.docx	Sample Label General Applicability	Sample Label Language	01/25/2016		
♥ CSI-HE	EPAS.9992ZZ.pdf	CSI-HEPAS.9992ZZ.pdf	CSI Report	01/26/2016		
	_					
← Re-	start			Next →		



 Any document errors will be displayed on the Certification Statements screen after clicking on "Review".



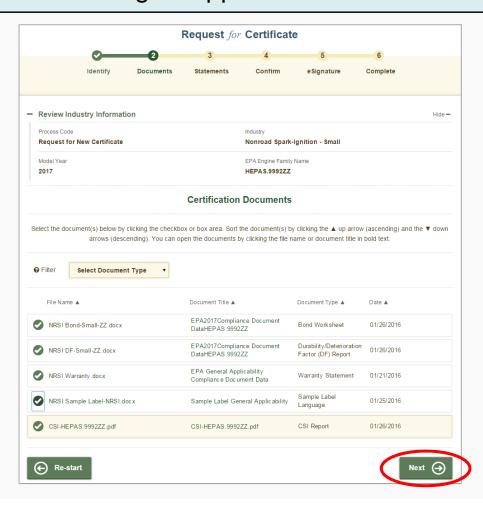


- To return to the Document Selection screen, either click the "Back" button or the check mark (♥) above "Documents"
- If expected document(s) are not appearing on the Document Selection screen, the missing document(s) must be uploaded from the Upload Certification Document link on the industry's Certification page.



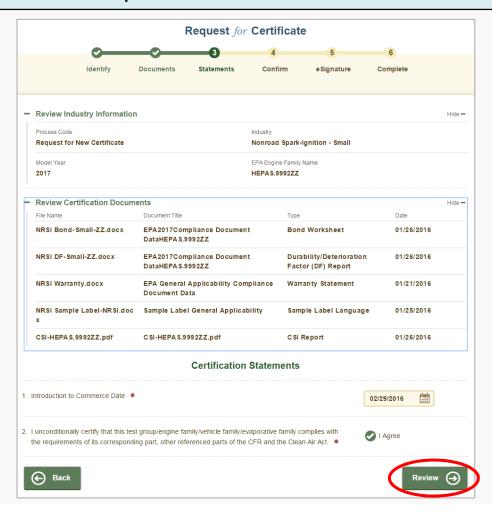


Click "Next" after selecting all applicable documents for this family



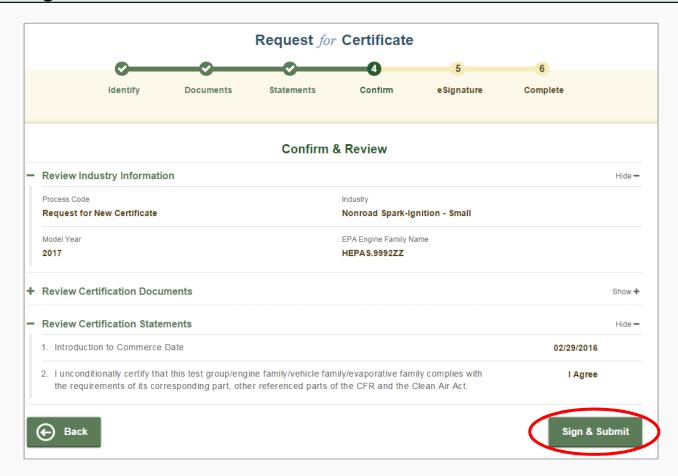


Answer all required Compliance Statements and click "Review"



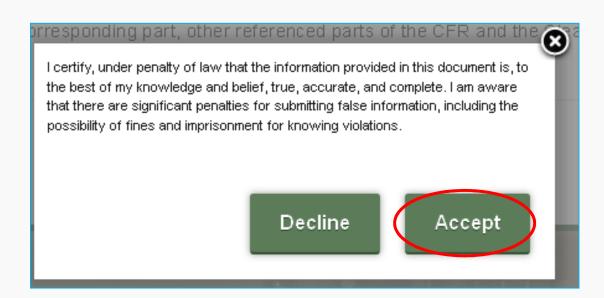


 Review the information you provided and click "Sign & Submit" if everything is correct



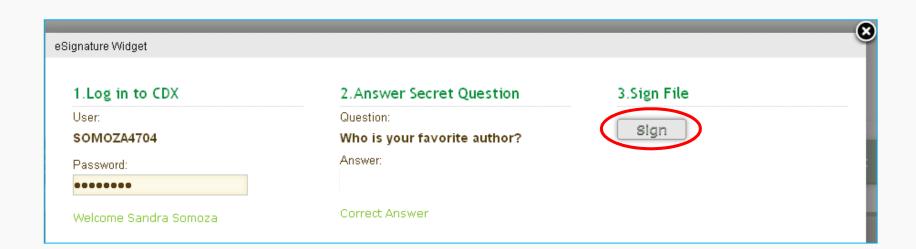


Read the CROMERR Electronic Signature message and click "Accept"



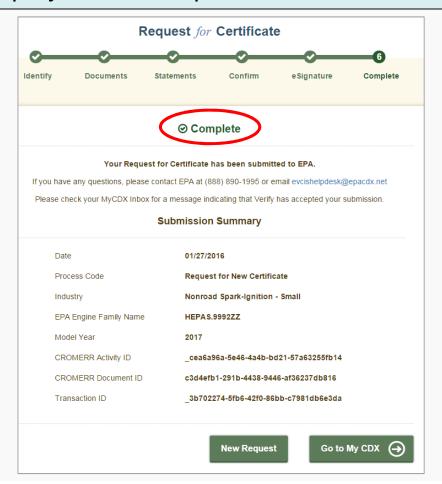


 Provide your CDX password and answer your secret question to electronically sign your Certification package. Click "Sign".





 Your Request for Certificate package has been submitted to EPA when "Complete" is displayed at the top of the confirmation screen.





The CROMERR Signer will receive a confirmation message in their CDX In-box for success Request for Certificate submissions. Click on the link to view the CROMERR package.

MyCDX Inbox My Profile Submission History Request for Certificate for HEPAS.9992ZZ Received From

Verify Administrator

Date 1/27/2016 2:15:43 PM

The Nonroad Spark-Ignition - Small Request for Certificate for EPA Engine Family Name HEPAS.9992ZZ has been successfully signed and submitted to EPA. You can view the signed Request for Certificate package through the Submission History link on your MyCDX page or by using the link below. Contact your EPA compliance representative for additional information.

https://test.epacdx.net/SilentHandoff?URL=https://testngn.epacdxnode.net/cromerrreview/action/submitter/details/details/ c4469f5a-7fd4-43e1-8899-4c2d10750f19

Transaction Identifier: 877822f6-26d1-4b1a-b852-e988c40136f3

Click here to view the status history.

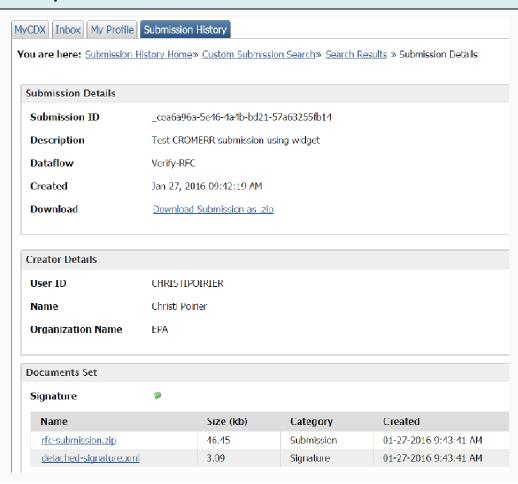
Thank you for submitting your request to Verify via CDX.

Back to Inbox

Delete

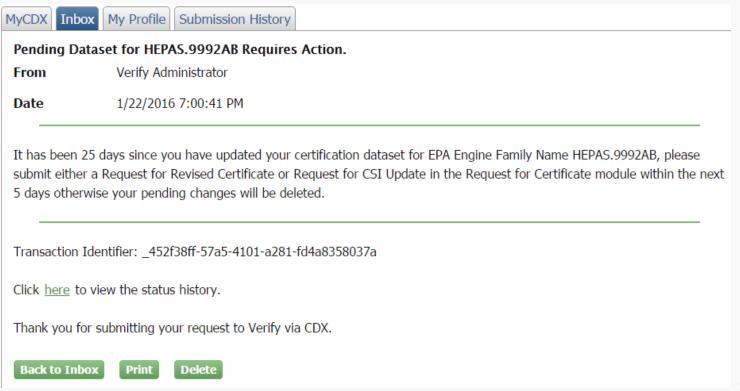


 The Request for Certificate CROMERR Package can be viewed by clicking on the .zip file below





 CDX Inbox warning message for any updates/corrections made to certified families that have not been finalized with a Request for Certificate (or Request for CSI Update).





 CDX Inbox message for any updates/corrections made to certified families that were not finalized within 30 days with a Request for Certificate (or Request for CSI Update) and were therefore deleted.





Additional Verify Information Sources

- Verify Website: www.epa.gov/otaq/verify
- Verify Listserver: <u>https://lists.epa.gov/read/all_forums/subscribe?name=verify</u>
- Manufacturer Guidance letters: <u>www.epa.gov/dis</u>
- For CROMERR and User Registration questions, please contact <u>verifydpc@epacdx.net</u>
- For Verify Request for Certificate questions, please contact: evcishelpdesk@epacdx.net



QUESTIONS



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
Company Authorizing Official (CAO)	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
Verify Submitter	Submitters of certification and compliance information to Verify except for requests for certificates of conformity	-		X		X
<u>CROMERR</u> <u>Signer</u>	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
- Each CROMERR Signer must complete the Verify User Registration Information spreadsheet with the "CROMERR Signer" role selected
- 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 60 already using the new RFC module.



What All Companies Need to Do: Verify Submitters

- 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
- 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



APPENDIX – SAMPLE CDX CRK EMAILS



CRK Email – U.S. Template

Hello [Persons name here],

A Pre-registration Customer Retrieval Key (CRK) has been created for you to utilize the VERIFY application via the Central Data Exchange (CDX) using the Manufacture Code of [insert MFR here] with a Role of "Submitter" and an ID Type of:

Certification Module: [Industry]

Please contact the CDX Helpdesk at (888)890-1995 or (970) 494-5500 where you will need to refer to this ticket [enter ticket number here] to obtain your CRK VERIFY CRK notification for [enter MFR here]

Once you have received your CRK, please access the CDX website using the following link:

https://cdx.epa.gov/SSL/CDX/preregistration.asp

If you already have a CDX account, you will be asked to provide the password for it.

If you have more than one CDX account, you will be asked to select the one you wish the CRK to be applied to and then provide the password for it.

If you don't currently have a CDX account, you will be asked to create an account with a user ID of your choice.

If you have any questions or require assistance, please contact us by utilizing one of the two contact numbers above or by emailing us at Helpdesk@epacdx.net



CRK Email – International Template

Hello [Persons name here],

A Pre-registration Customer Retrieval Key (CRK) has been created for you to utilize the VERIFY application via the Central Data Exchange (CDX) using the Manufacture Code of [insert MFR here] with a Role of "Submitter" and an ID Type of:

Certification Module: [Industry]

Please contact the CDX Helpdesk at (888)890-1995, 970-494-5500 internationally or by email, Helpdesk@epacdx.net where you will need to refer to this ticket [enter ticket number here] to obtain your CRK VERIFY CRK notification for [enter MFR here]

Once you have received your CRK, please access the CDX website using the following link:

https://cdx.epa.gov/SSL/CDX/preregistration.asp

If you already have a CDX account, you will be asked to provide the password for it.

If you have more than one CDX account, you will be asked to select the one you wish the CRK to be applied to and then provide the password for it.

If you don't currently have a CDX account, you will be asked to create an account with a user ID of your choice.

If you have any questions or require assistance, please contact us by utilizing any of the contact methods as listed above.