



May 20, 2009

**RE: CROMERR Application Deadline; New EPA Assistance and Tools**

THE  
ENVIRONMENTAL  
COUNCIL OF  
THE STATES

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David K. Paylor  
Director, Virginia Department of  
Environmental Quality  
PAST PRESIDENT

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R. Steven Brown  
Executive Director

Dear Colleague,

I am writing to provide you with an important update on U.S. EPA's Cross-Media Electronic Reporting Regulation (CROMERR). This regulation applies to state, tribe and local government environmental program data systems that accept electronic reports from facilities they regulate under delegation or authorization from EPA. CROMERR requires that all systems receiving such reports meet certain standards and apply for approval under the regulation by January 13, 2010.

Applications Should Be Sent Sooner Rather Than Later

To date, EPA has received a total of 29 applications, of which eight are approved and running. The agency, however, is concerned that the remaining state systems will be out of compliance if they do not submit their CROMERR applications by the January 2010 deadline, and has contacted the ECOS Data Management Work Group (DMWG) and other states in an effort to identify potential barriers to implementing the regulation. Although EPA's recent guidance is helping States to overcome existing barriers, as Chair of the DMWG, I am urging all states to submit their applications as soon as feasibly possible.

States Should Remind POTWs of CROMERR Deadline

EPA is also concerned that Publicly Owned Treatment Works (POTWs) and other local governments with delegated programs may be operating electronic reporting systems subject to CROMERR but may not be aware of their CROMERR obligations. EPA is requesting that states contact POTWs and others to inform them about CROMERR and the pending deadline. The agency also is asking states to help it identify local facilities so that EPA might reach out to these local entities and offer them assistance to comply with the regulation.

EPA Technical Assistance, Tools and Checklists

EPA has an active CROMERR outreach and technical assistance program that provide a variety of tools to help states prepare successful applications. Agency staff continues to conduct full-day "CROMERR 101" webinars as well as monthly CROMERR Q&A sessions. To be added to the email list to receive notification of these training opportunities, contact Adele Vogelgesang (Ohio EPA), the state CROMERR liaison, at [adele.vogelgesang@epa.state.oh.us](mailto:adele.vogelgesang@epa.state.oh.us).

New assistance tools posted on EPA's CROMERR website ([www.epa.gov/cromerr](http://www.epa.gov/cromerr)) include summaries of technical approaches that states have successfully used to meet the CROMERR performance standards, copies of approved applications that can serve as models, a checklist-style roadmap to CROMERR requirements, a step-by-step guide to apply for CROMERR approval, as well as other resources. Plus, at the request of a state, EPA CROMERR staff will work with programs one-on-one to review draft applications and provide guidance and technical assistance calls during the application process.

May 20, 2009  
CROMERR Letter to ECOS Members  
Page 2

Finally, the *Exchange Network* wiki features helpful insights from state staffs including state-specific information, documents, and web links. Go to:

[www.exchangenetworkwiki.com/wiki/index.php/CROMERR](http://www.exchangenetworkwiki.com/wiki/index.php/CROMERR).

I strongly encourage your agency to take full advantage of these services and tools. If you have questions about CROMERR or would like to request assistance, please contact either David Schwarz at [schwarz.david@epa.gov](mailto:schwarz.david@epa.gov), (202) 566-1704) or Evi Huffer at [huffer.evi@epa.gov](mailto:huffer.evi@epa.gov), (202) 566-1697).

EPA has been working hard over the past several months to identify and solve CROMERR-related problems at the state level. David and Evi can work with your agency to help your e-reporting systems receive final EPA approval.

Sincerely,



Karen Bassett  
Chair, ECOS Data Management Work Group  
Chief Deputy Director, Arkansas Dept. of Environmental Quality