

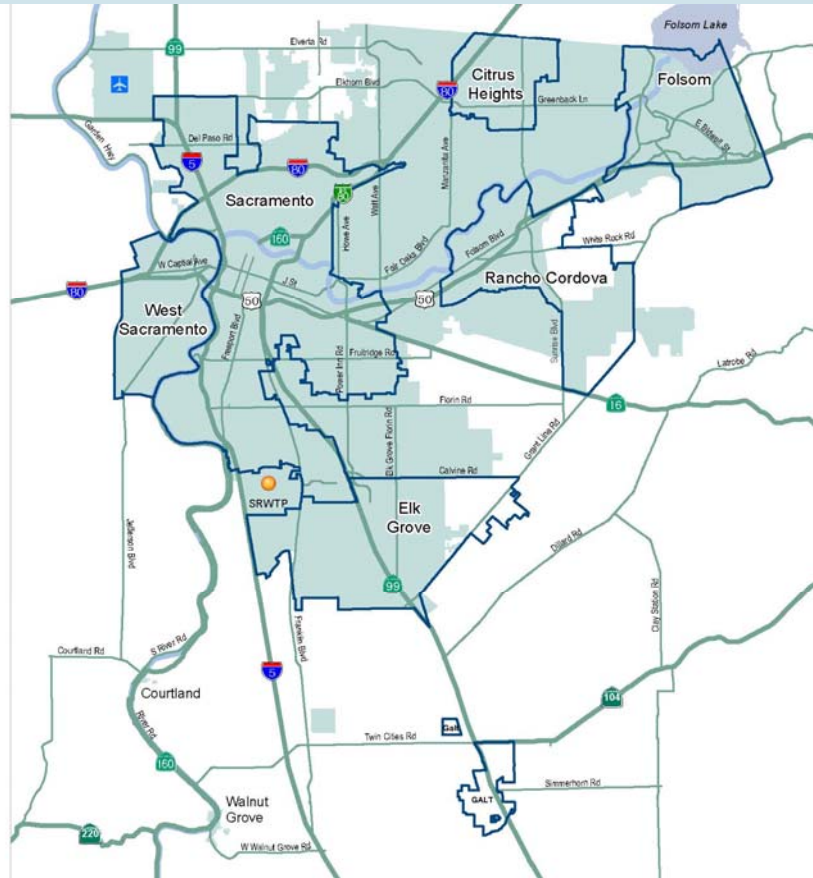


Bringing Pretreatment Into the Modern Era CROMERR Compliant Electronic Document Submittal

North Carolina Pretreatment Consortium
October 2021

Nicole Sears, Environmental Specialist
Sacramento Regional County Sanitation District

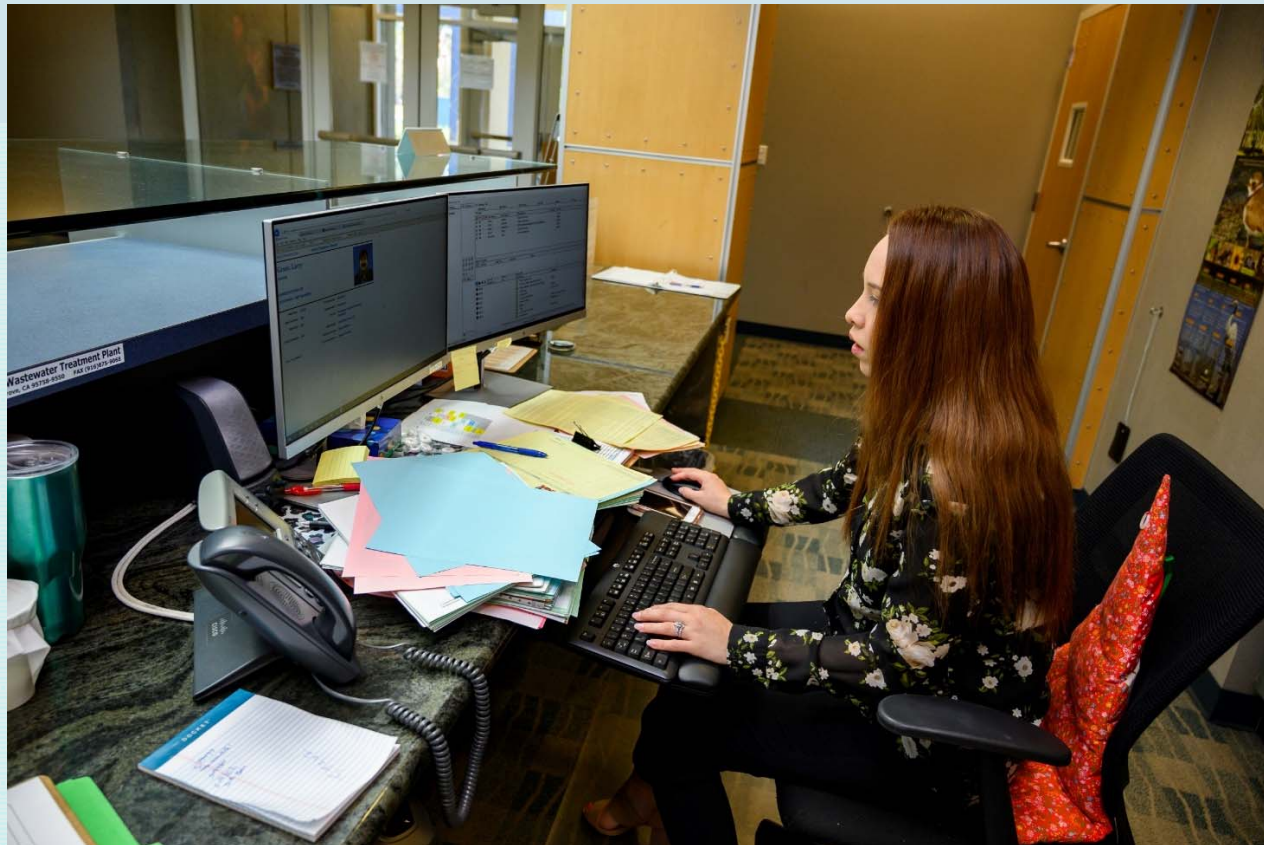
POTW: Sacramento Regional County Sanitation District (Regional San)



Pretreatment Program: Wastewater Source Control Section



Pretreatment Program, cont.



2016 Pretreatment Compliance Audit Report



REQUIREMENT:

“Collect hard-copies of electronic self-monitoring reports from all Significant Industrial Users...”

CROss Media Electronic Reporting Rule

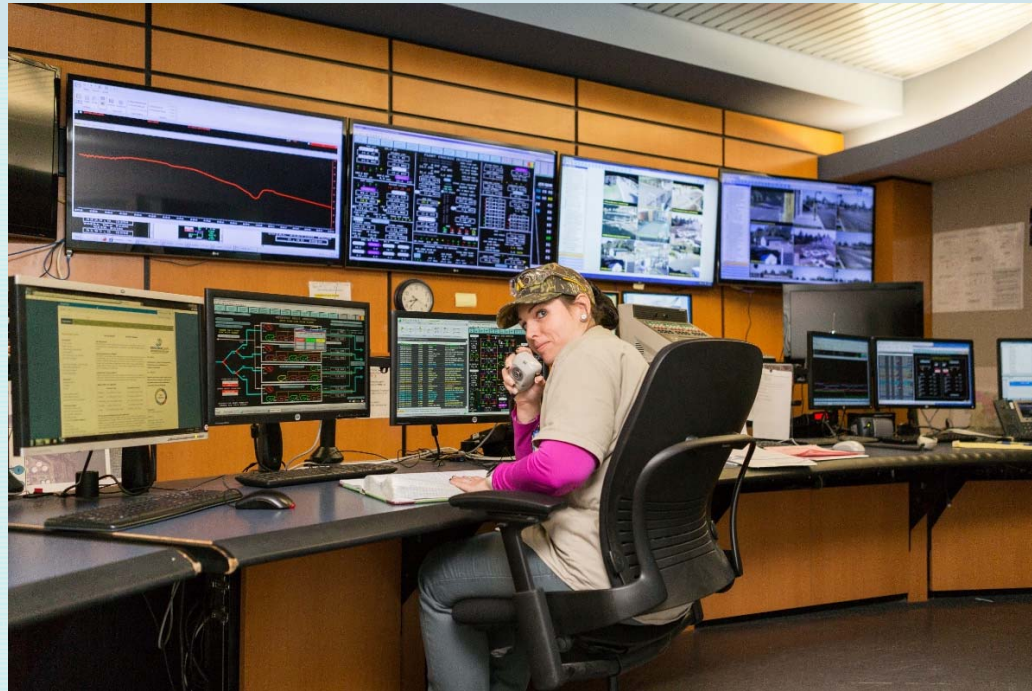


CROMERR 40 CFR §3
(2005)

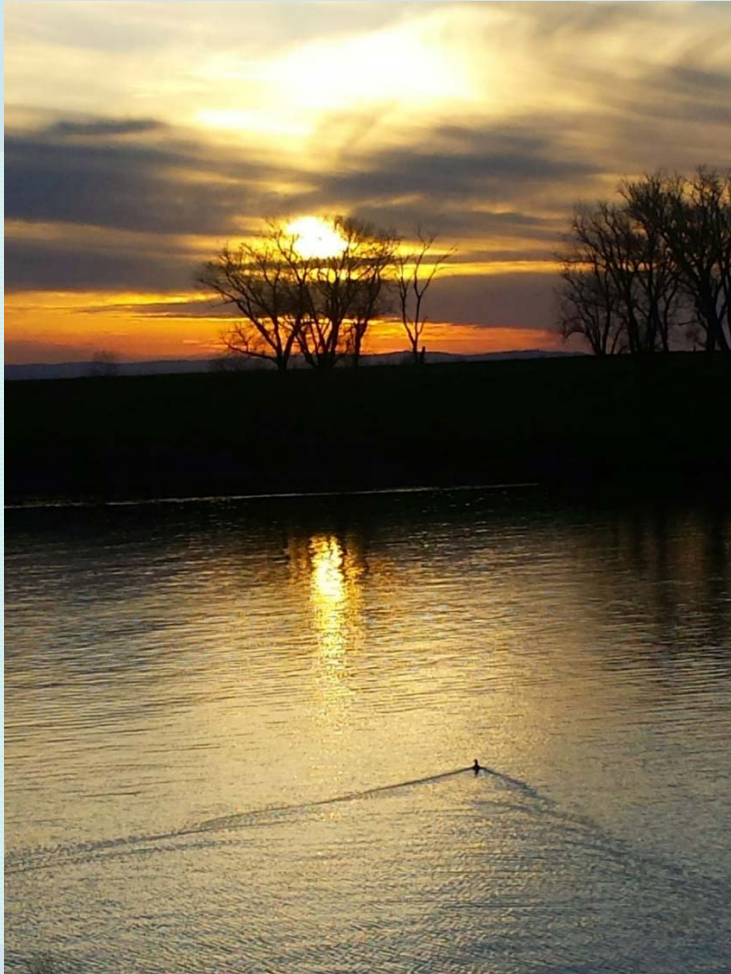
Establishes standards for information systems that receive reports and other documents electronically.

Why not email?

- Alterable attachments
- Unintentional submittals
- No opportunity to review and repudiate the Copy of Record
- Scanned signatures are not considered to be valid e-signatures



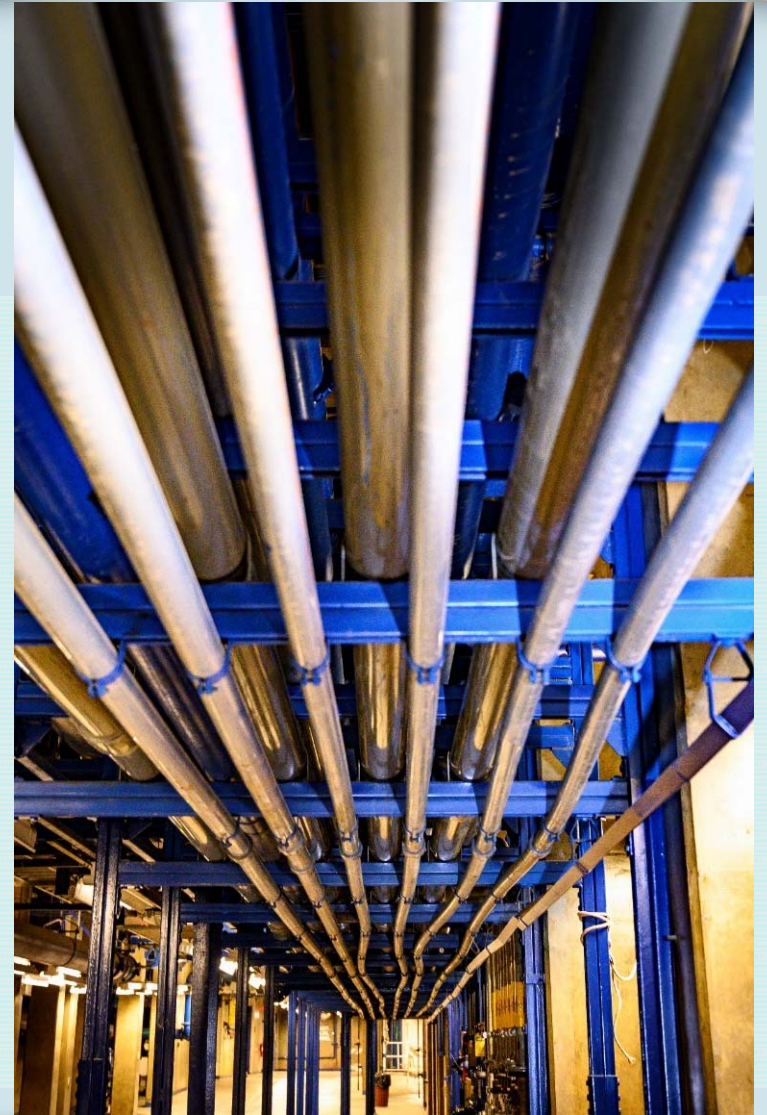
A Return to the Dark Ages



- Permitted industries notified
- Hard copy reports ONLY
- Significant increase in administrative burden on inspector staff

Why not purchase CROMERR compliant software?

- Satisfied with custom in-house software
- Commercial off-the-shelf software overlap
- Lack of time to research solutions



Advanced Shared CROMERR Services (SCS)

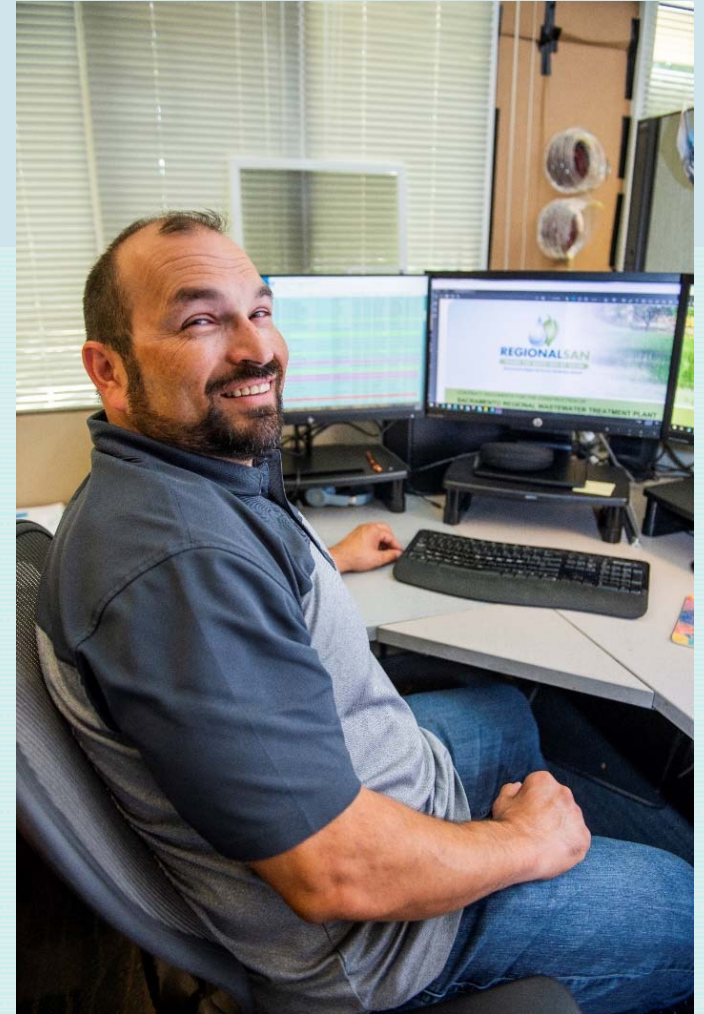


- Secure, web-based portal
- Equivalent legal integrity
- CROMERR compliant
- **Free!**

<https://encromerrdev.epacdxnode.net/about>

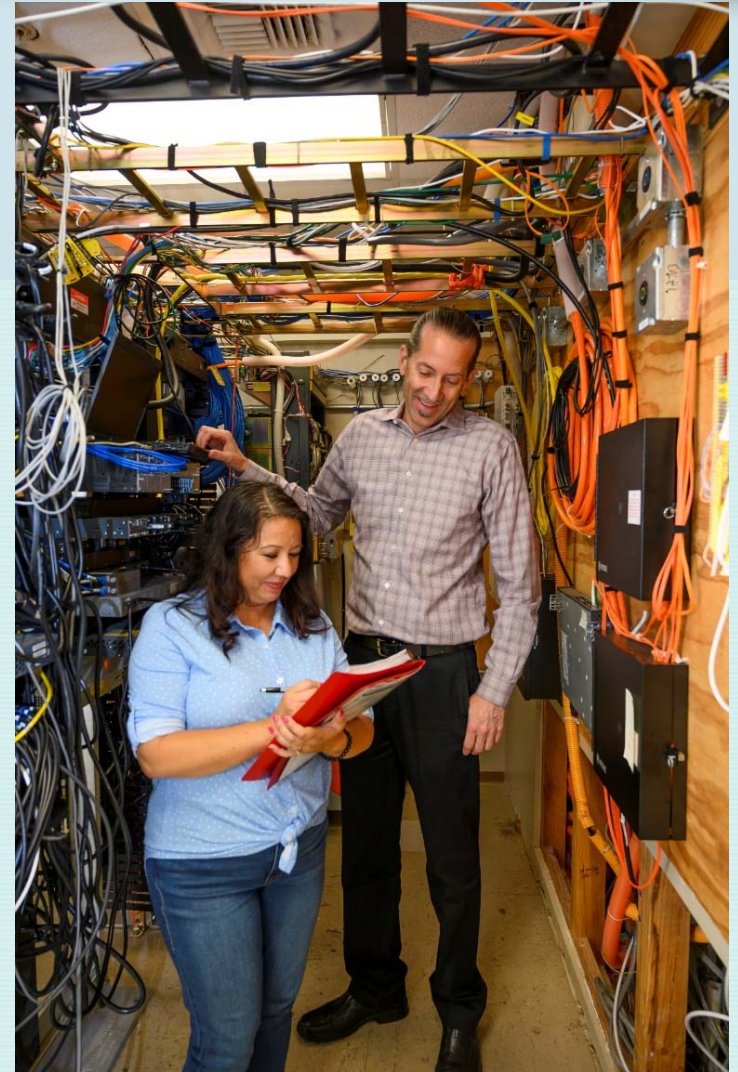
Pretreatment Program Benefits

- Simplified approval process
- Technical support provided by EPA
- Easy to use
- Reduces paper waste
- Saves inspectors' time



Phase 1: First Steps

- Notified stakeholders
- Met with and established a legal agreement with EPA's Office of Information Management
- Read regulations, guidance documents, and technical specifications (multiple times)
- [CROMERR Guide for POTWs](#)



Priority Reports

CROMERR § 3.2000(b)(5)(vii) Appendix 1

- Reports identified as likely to be material to potential enforcement litigation
- Require identity proofing prior to system use

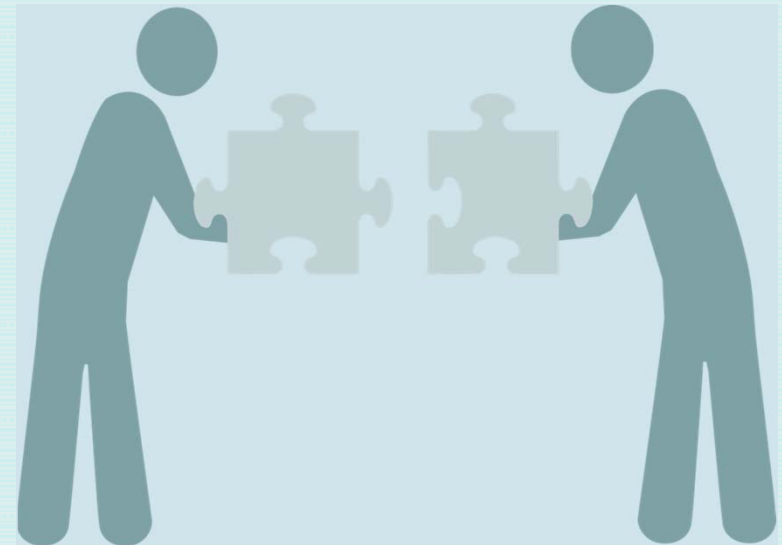


https://www.epa.gov/sites/production/files/2015-08/documents/cromerr_101_course_summary.pdf

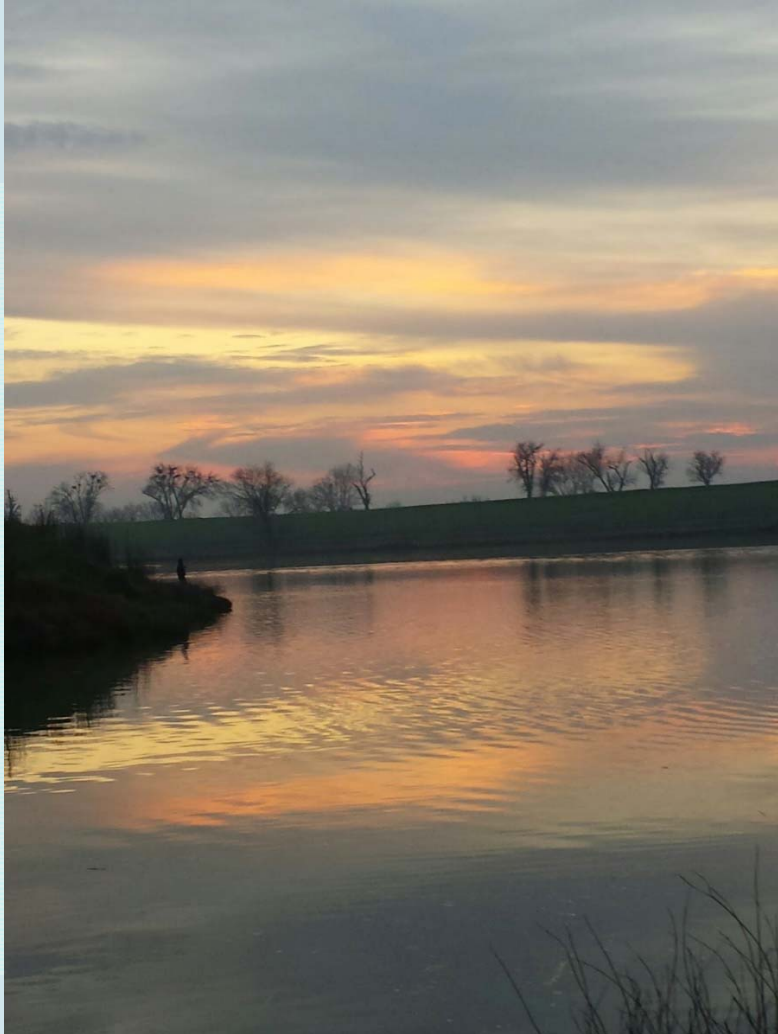
Phase 2: Technical Specifications

Collaborative effort between EPA, CGI Federal (software developer), and pretreatment program staff

- Roles and workflow established
- Identity proofing method selected
- Named it the Pretreatment Program Reporting Service



Phase 3: CROMERR Approval



- EPA's CROMERR Program
- Consultant provided application assistance
- Attorney General's Office certification of the NPDES Program

Legal Authority

- Application submitted
- Covid-19 disruptions
- Initial application denied due to insufficient legal authority



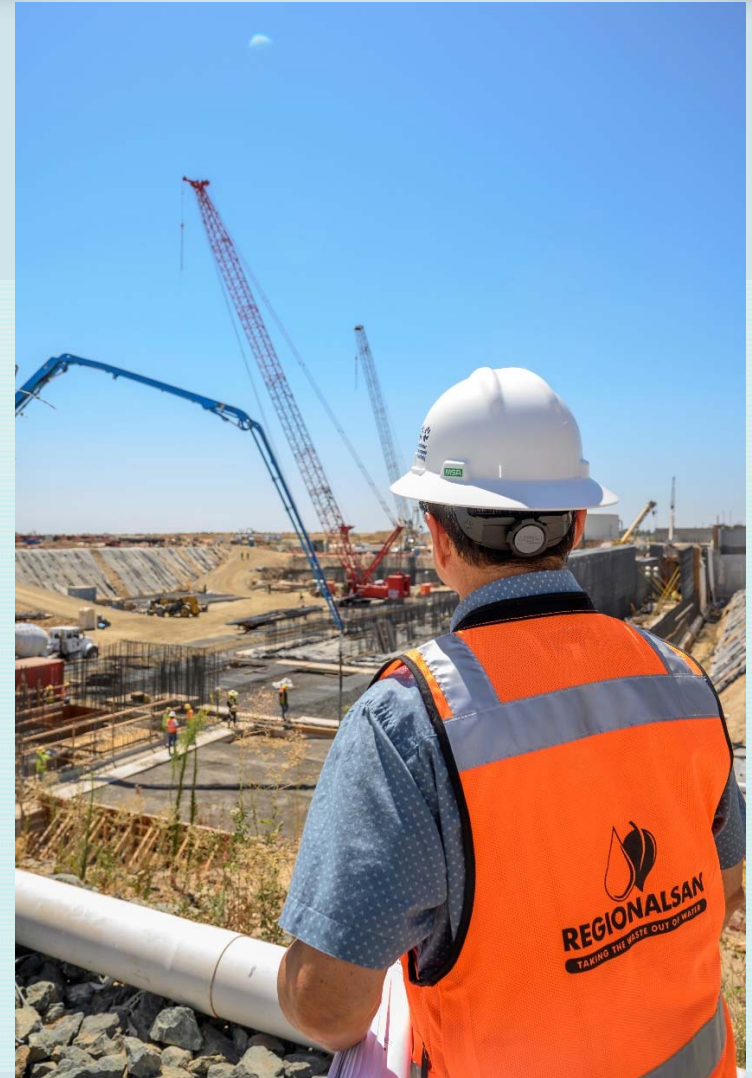
Regional San Consolidated Ordinance

2.7.10 Electronic Reporting

The District accepts electronic documents using a system compliant with 40 CFR Part 3 (Cross-Media Electronic Reporting). Users that intend to send electronic (digital) documents to the District to satisfy the requirements of this Chapter must submit a signed Subscriber Agreement to the District for approval and register online for the Pretreatment Program Reporting Service.

Application Re-submittal

- Ordinance amendment
- Certification statement establishing legal authority
- Reference to Uniform Electronic Transactions Act



Application Approved



JANUARY 2021

Phase 4: Non-Substantial Program Modification “Notification”

Requirements (40 CFR § 403.9)

- Maintenance of legal authorities
- **Development and implementation of procedures**
- Organizational duties
- Resources required

Phase 4: Program Modification, cont.

- Electronic Subscriber Agreement
- Electronic Compliance Document Submittal Policy

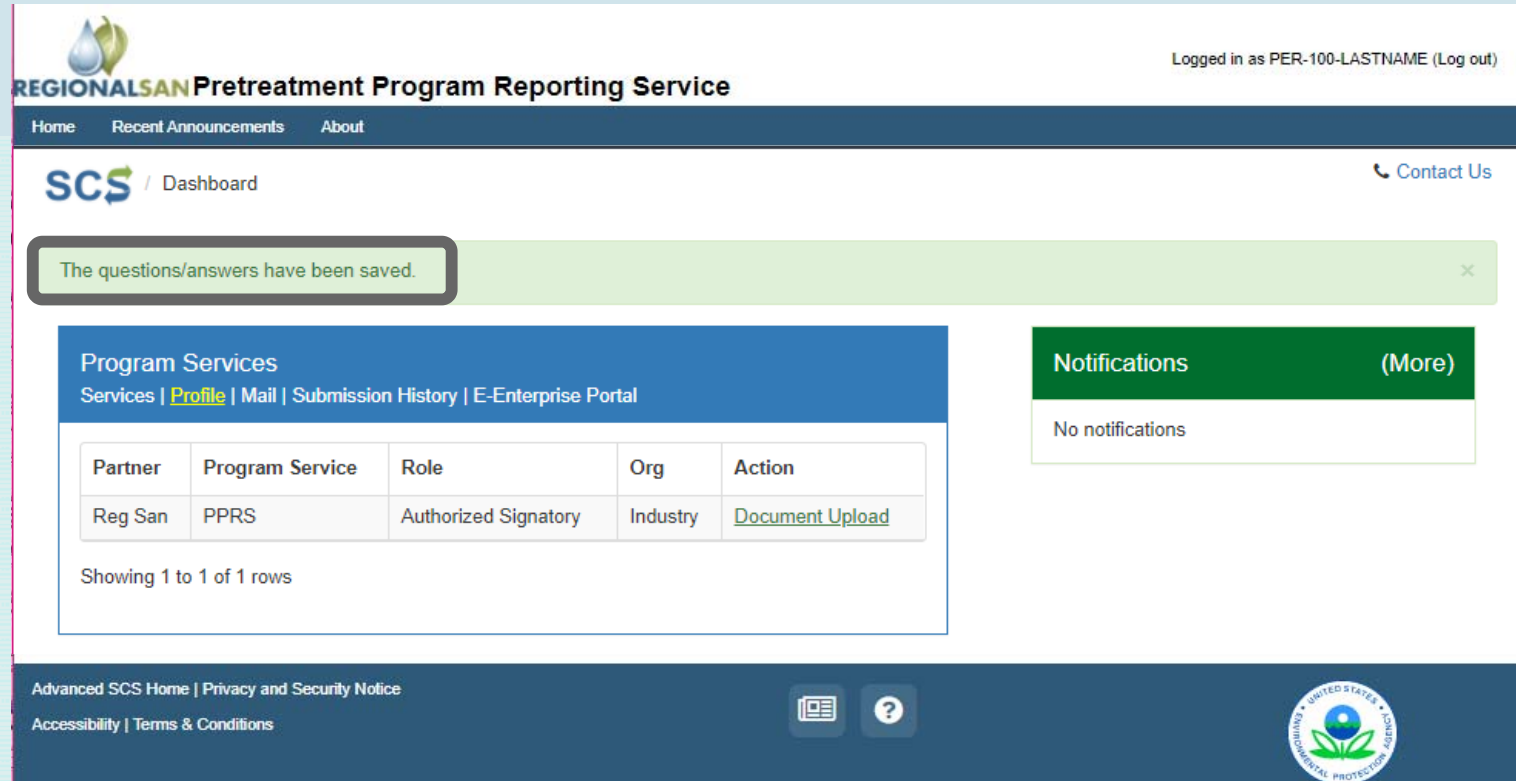


PPRS Instructional Documentation

ACCOUNT INITIATION

Congratulations! You are now registered for the system and may begin uploading documents immediately.

PPRS Dashboard



The screenshot shows the PPRS Dashboard interface. At the top, there is a green header bar with the text "PPRS Dashboard". Below this, the main content area has a white background. On the left, there is a blue sidebar with the "SCS" logo and the text "Dashboard". The main content area features a green notification bar at the top stating "The questions/answers have been saved." Below this, there is a section titled "Program Services" with a blue header. Under this header, there are links for "Services", "Profile", "Mail", "Submission History", and "E-Enterprise Portal". A table is displayed with the following data:

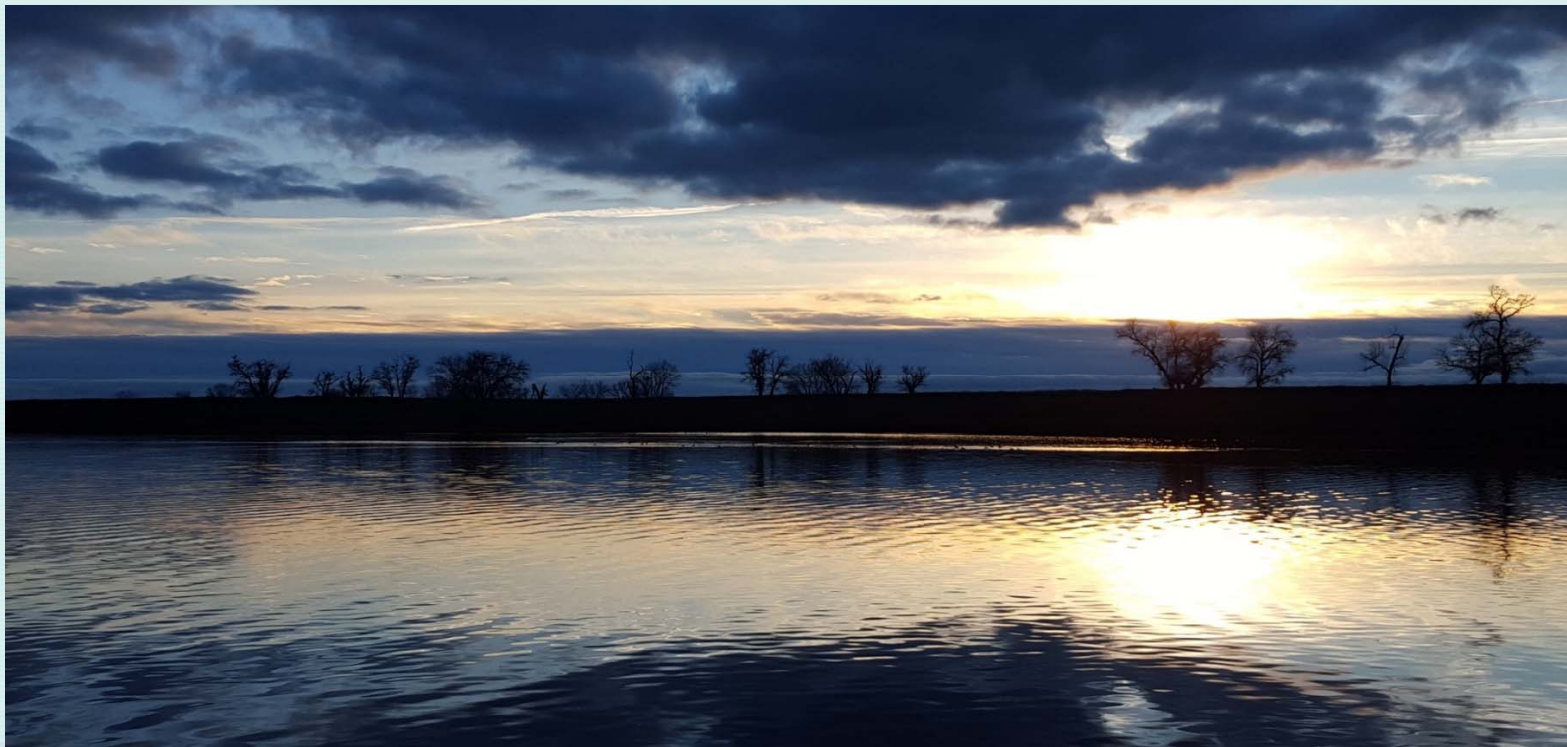
Partner	Program Service	Role	Org	Action
Reg San	PPRS	Authorized Signatory	Industry	Document Upload

Below the table, it says "Showing 1 to 1 of 1 rows". To the right of the table, there is a green box titled "Notifications" with a "(More)" link. Inside this box, it says "No notifications". At the bottom of the dashboard, there is a dark blue footer bar containing links for "Advanced SCS Home", "Privacy and Security Notice", "Accessibility", and "Terms & Conditions". There are also icons for a calendar and a help/question mark, and the EPA logo on the right.

NOTES: This is the dashboard and is the screen you will see every time you access your PPRS account by logging in.

Phase 4: Program Modification, cont.

If no comment received, may implement the program modification in 45 days from the date of the submittal.



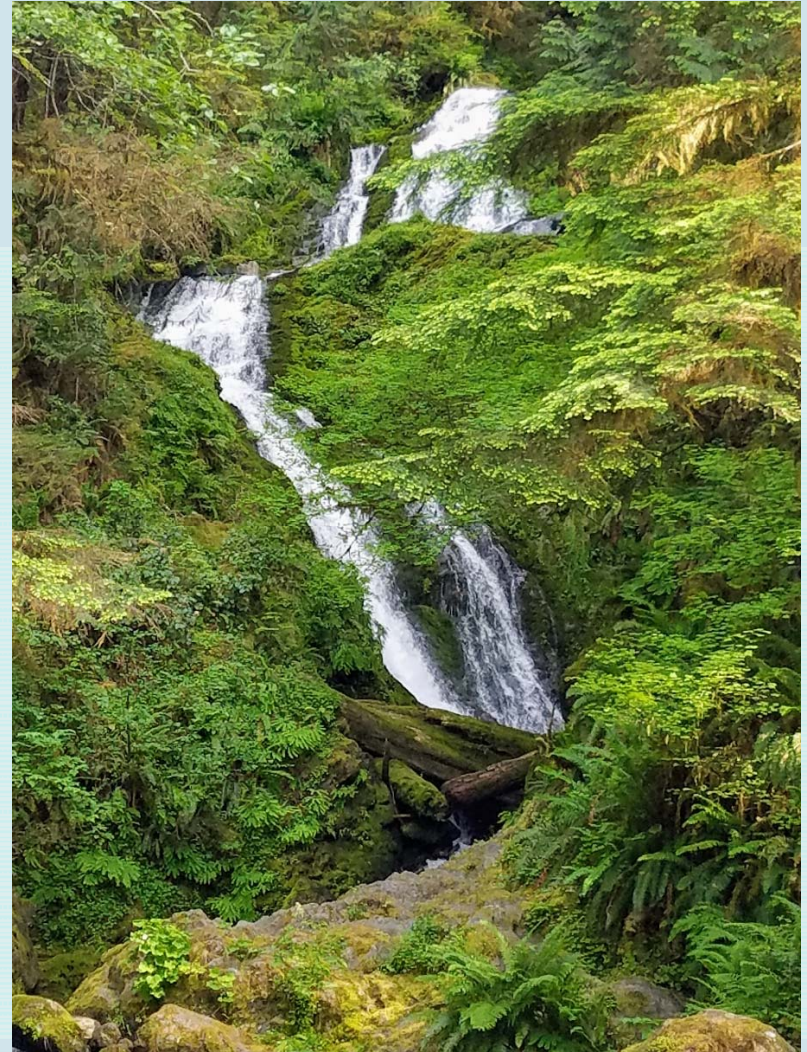
45 Days After Submission of Program Modification



Official rollout of the
Pretreatment Program
Reporting Service on
April 19, 2021!

Phase 5: Implementation

- Communicate electronic reporting option to permittees
- Receive, review, and file electronic subscriber agreements
- Pilot testing
- Request system improvements for both industry and WSCS



Pretreatment Program Reporting System (PPRS) Login Screen



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[Advanced Shared Services](#)

[Contact Us](#)



Log In

User ID

Password

[Log In](#)

[Register with SCS](#)

[Forgot your Password or User ID?](#)

[Warning Notice and Privacy Policy](#)

Welcome

Welcome to the Environmental Protection Agency (EPA) Shared CROMERR Services (SCS) - the Agency's electronic reporting site. The Shared CROMERR Services concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.

[Warning Notice and Privacy Policy](#)

Warning Notice

EPA's Shared CROMERR Services Registration procedure is part of a United States Environmental Protection Agency (EPA) computer system, which is for authorized use only. Unauthorized access or use of this computer system may subject violators to criminal, civil, and/or administrative action. All information on this computer system may be monitored, recorded, read, copied, and disclosed by and to authorized personnel for official purposes, including law enforcement. Access or use of this computer system by any person, whether authorized or unauthorized, constitutes consent to these terms.

Privacy Statement

EPA will use the personal identifying information which you provide for the expressed purpose of registration to the Shared CROMERR Services site and for updating and correcting information in internal EPA databases as necessary. The Agency will not make this information available for other purposes unless required by law. EPA does not sell or otherwise transfer personal information to an outside third party. [Federal Register: March 18, 2002 (Volume 67, Number 52)][Page 12010-12013].

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[Accessibility](#) | [Terms & Conditions](#)



PPRS Dashboard



REGIONAL SAN Pretreatment Program Reporting Service

Logged in as SEARSNICOLE (Log out)

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Dashboard

[Contact Us](#)

Program Services

[Services](#) | [Profile](#) | [Mail](#) | [Submission History](#)

Partner	Program Service	Role	Org	Action
Reg San	PPRS	RMAM	Sacramento Regional County Sanitation District	Handoff

Showing 1 to 1 of 1 rows

Notifications

(More)

No notifications

Admin Tools

[Alert Publishing](#)
[Create User Account](#)
[CROMERR Administration](#)
[Advanced SCS Lexis Nexis Report](#)
[Lexis Nexis Partner Summary Report](#)
[Lexis Nexis User Detail Report](#)
[Organization Management](#)
[Pending Requests](#)
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[User Management](#)

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Reports Submitted to PPRS



REGIONAL SAN Pretreatment Program Reporting Service

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[Dashboard](#) / [Admin Tools](#) / [Cromerr Administration](#) / [Search](#) / Results

[Contact Us](#)

CROMERR Administration - Search Results

311 items found.



☐	Name	Signature Timestamp	User ID	Submission ID
☐	04-15-21 Yara Temp Discharge Ltr.pdf	04-20-2021 03:21:07PM	GRW-060-CRETS	_12524562-73a2-4df5-a2aa-638cb308013b
☐	04-15-21 Yara Temp Discharge Ltr.pdf	04-20-2021 03:23:12PM	GRW-060-CRETS	_861222d8-656a-43a0-86c7-a4439197e26f
☐	05-10-21 Sacayanan to Andrew Spittler re VSWTP Wastewater Discharge Volumes for April 2021.pdf	05-10-2021 06:23:57PM	WTP-SCWA-PASTERSKI	_00ca4f07-a01f-454c-8619-2cf49b22dfec
☐	05-2021 MAY Compliance Report - Letter of Explanation for May 29.pdf	06-10-2021 11:35:08AM	BEV-004-METZEN	_dd4cc06a-e232-451c-8b01-8a5efa9ffd0c
☐	05-2021 MAY Compliance Report - Signed.pdf	06-10-2021 11:34:08AM	BEV-004-METZEN	_9ebe3a18-b9a7-458c-b48e-d7c60eef92f4
☐	05-2021 MAY Discharge Charts - Influent pH Week of 5-29.pdf	06-10-2021 11:43:12AM	BEV-004-METZEN	_7153a6cb-b766-483f-9977-79bc3ee56b6c
☐	05-2021 MAY Discharge Charts.pdf	06-10-2021 11:42:02AM	BEV-004-METZEN	_06af44d2-b61c-44bf-8cd8-846f40f2e721
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☐	06-2021 JUNE Compliance Report - Signed.pdf	07-23-2021 01:06:44PM	BEV-004-METZEN	_ff7d01f9-58d9-4c21-87e5-d052bf7f430b
☐	06 June 2021 SRCSD Discharge Report.pdf	07-07-2021 05:29:40PM	GRW-030-VANDERDUSSEN	_16722091-18af-4e99-bcb7-473ec4f57ffe

Showing 1 to 10 of 311 rows rows per page

< 1 2 3 4 5 ... 32 >

Individual Submittal



REGIONAL SAN Pretreatment Program Reporting Service

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[Contact Us](#)

CROMERR Administration - Submission

Submission Details

User ID	WTP-SCWA-PASTERSKI
Name	Tom Pastorski
Submission ID	_3645d42e-5074-4d6d-a190-b61850cf78a4
Dataflow	PPRS
Created	6/10/2021 5:06:21 PM

Document Set

Signature: Valid

Document Name	06-10-21 Sacayanan to Andrew Spittler re VSWTP Wastewater Discharge Volumes for May 2021.pdf
Document ID	fb016add-a0c5-4ed8-9979-89fcfaf00ace

☒ [View Submission for Retention and Repudiation](#)

Document Name	detached-signature.xml
Document ID	cc344745-ea70-4091-9a47-79def6cf5ff1

[Back](#)

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Electronic Signature (xml)

This XML file does not appear to have any style information associated with it. The document tree is shown below.

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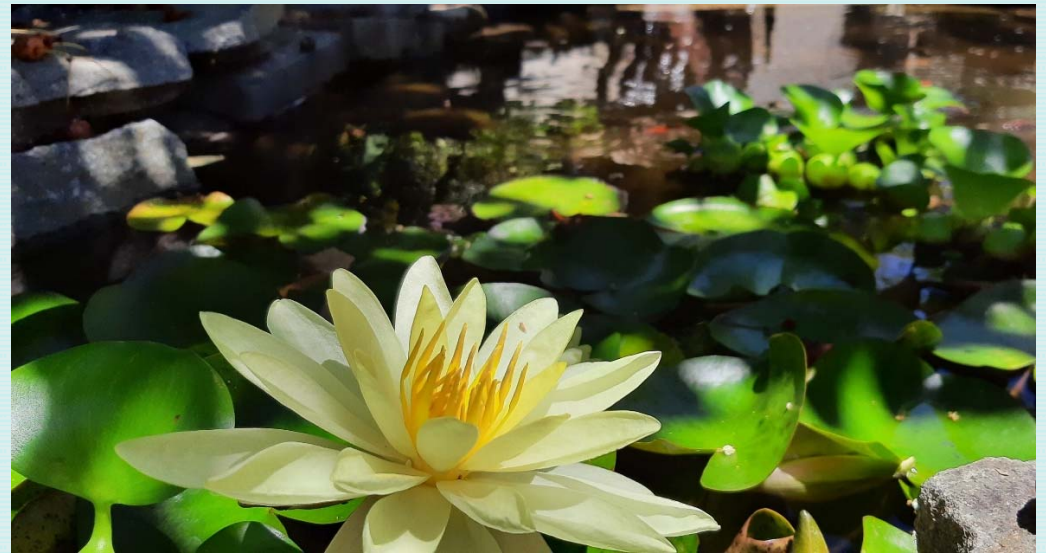
PPRS System Statistics to Date



- 84 Pre-registered Users
- 54 Active Users
- 51 Industries
- 311 Electronically Signed Documents

Lessons Learned

- Persistence and patience pay off!
- Ask... and ask again.
- Take the long view.
- Help is available!



Pretreatment Programs Enforce the Clean Water Act

- The work we do is vital to water quality.
- Legal defensibility is critical to ensuring enforcement actions will be upheld by the courts, if needed.
- Email is not a secure method to receive documents.
- CROMERR enables secure transmission of legal documents.



Useful References

[Publicly-Owned Pretreatment Works \(POTW\) Programs and Electronic Reporting](#)

[CROMERR 101: Fundamentals for States, Tribes, and Local Governments](#)

[Course Summary](#)

[Shared CROMERR Services](#) (including Advanced SCS)

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Questions?



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