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## CROMERR Success Story Delaware Department of Natural Resources and Environmental Control

Delaware Department of Natural Resources and Environmental Control (DNREC) submitted a consolidated Cross-Media Electronic Reporting Regulation (CROMERR) application to EPA that covers modifications and revisions to incorporate electronic reporting into multiple air, water, and waste programs authorized under 40 CFR. The application describes how DNREC will use an existing electronic document receiving system, their web based Online Reporting System (ORS), to implement electronic reporting for all these programs, including those that will require electronic signatures for CROMERR "priority" and "non-priority" reports. Based on a review of DNREC's submission, EPA has determined that ORS will meet all applicable CROMERR requirements for electronic document receiving systems, and that the application is approvable. DNREC is currently completing updgrades needed to bring ORS into conformance with the system as it is described in the CROMERR application. Formal approved will be announced as soon as DNREC notifies EPA that the upgraded ORS is operational; this is tentively scheduled for April, 2009.

As an enterprise-wde system for DNREC electronic reporting, ORS provides a single, unified and consistent approach to meeting CROMERR requirements for all electronic reporting under DNREC's EPA-authorized programs. This approach provides a number of advantages, including greater economies of scale, faster implementation, easier system support and maintenance, and a single organizational focal point for CROMERR compliance.

## The Delaware's Solution to Meeting CROMERR Requirements

DNREC ORS builds upon DNREC's existing Online eGovernment web site to allow regulated businesses to electronically sign and submit Air National Emissions Inventory Reports, Asbestos Removal Reports, National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Reports, Hazardous Waste Generator Registrations and Annual Reports, and Storm Water Notices of Intent. When fully upgraded. DNREC ORS will be a web-portal-based document



management system that provides repository, audit and retrieval features through an intuitive, user-friendly but highly secure user interface. DNREC ORS will provide a user ID/passwordbased approach to user authentication and signature that includes the use of challenge question and response methodology for second-factor assurance of valid electronic signatures under CROMERRR. Users who sign and submit reports on behalf of regulated entities will navigate to the portal, sign in, use their password and the answer to a challenge question to execute electronic signatures, and then submit their signed reports to the system. These reports will then be validated, stored, and routed to the appropriate authority within the agency for acceptance or rejection.