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# Defect and Voluntary Emission Report System

Guidance for Submitting Emission Defect  
Information Reports and Voluntary Emission  
Recall Reports to the Verify Document Module

# Defect and Voluntary Emission Report System

## Guidance for Submitting Emission Defect Information Reports and Voluntary Emission Recall Reports to the VERIFY Document Module

Compliance and Innovative Strategies Division  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency

## BACKGROUND AND INTRODUCTION

All manufacturers are required to submit reports to the United States Environmental Protection Agency (EPA) describing emission-related defects and plans for remediation of indicated defects to the EPA according to the regulations in 40 CFR §85.1903 and §85.1904, respectively. This document describes the general process for submitting electronic versions of Emissions Defect Information Reports (DR), Voluntary Emission Recall Reports (VERR), and VERR Quarterly Update Reports (QR) to the Verify Document Module.

Previously, manufacturers submitted DRs, VERRs, and QRs to EPA in hard-copy form via regular mail delivery or in various electronic files via e-mail. To standardize the forms, improve the submission process, and provide for improved storage and use of the data EPA developed electronic forms to allow electronic submittal of DRs, VERRs, and QRs. In order to use existing systems and automate the submittal process, EPA is using the Document Module of the Verify data management system to collect these electronic files.

Once the new DR/VERR/QR electronic forms are implemented, the process described in this document will be the only method available to manufacturers for submitting DR/VERR/QRs unless otherwise directed.

# DEFECT AND VOLUNTARY EMISSION REPORTS - VERIFY DOCUMENT MODULE SUBMITTAL PROCESS

## VERIFY DOCUMENT MODULE ACCESS VIA CDX

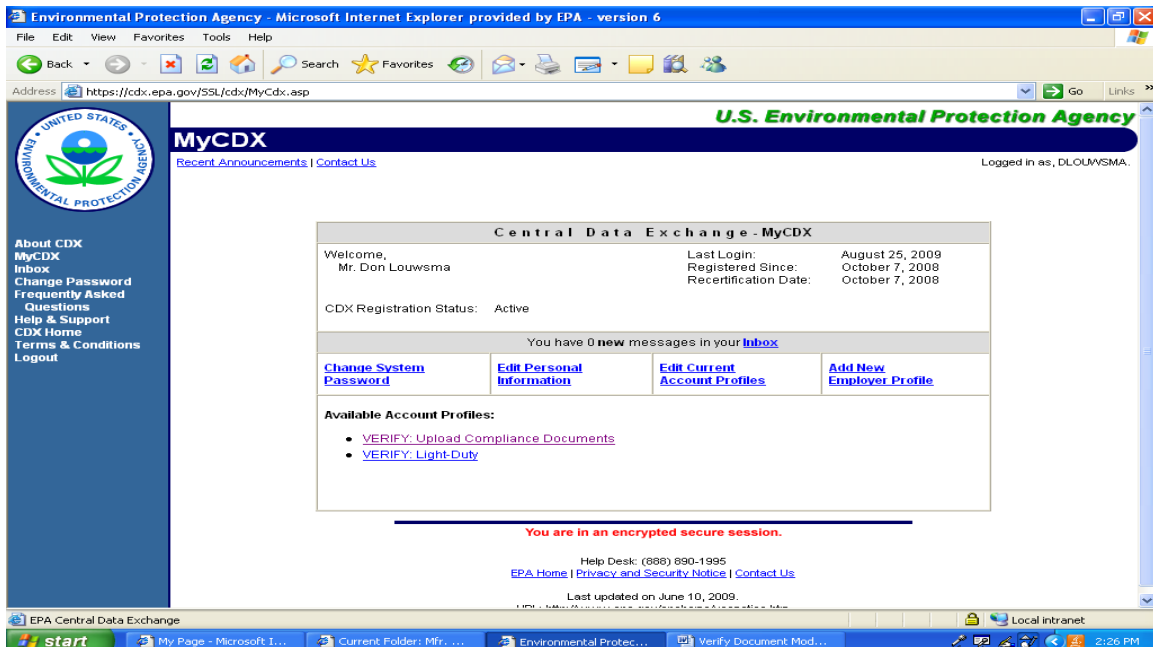
1. Log on to the Central Data Exchange (CDX) home page at <http://www.epa.gov/cdx/> and enter your login name and password.

The screenshot shows the Central Data Exchange (CDX) website in a Windows Internet Explorer browser window. The address bar displays <http://www.epa.gov/cdx/>. The page header includes the U.S. Environmental Protection Agency logo and the text "Central Data Exchange". A search bar is present with the text "Search: All EPA This Area" and a "Go" button. Below the search bar, the text "You are here: EPA Home » Central Data Exchange" is displayed. The main content area features a large graphic with the text "CDX CENTRAL DATA EXCHANGE" and a navigation menu with links: Home, About CDX, CDX Benefits, Getting Started, CDX Projects, and Partners. A paragraph describes the CDX as a centralized point of access for environmental data submissions. A list of benefits is provided, including: Submit data through one centralized point of access; Fill out a single electronic form; Receive Agency confirmation; Submit data in various formats; Exchange data with target systems; Reduce costs; and Utilize publishing services. A "Current Snapshot" box shows statistics: 125,887 CDX User Registrations, 44 systems in production, and 16 systems in test or development. A "Related Programs" box lists: Cross-Media Electronic Reporting Rule, Exchange Network, and Network Grants Program. The footer includes a "Have a question about CDX?" section with contact information for the CDX Help Desk and a navigation bar with links: Home | About CDX | CDX Benefits | Getting Started | CDX Projects | Partners. The Windows taskbar at the bottom shows the Start button and several open applications, including Mail, Central Data Exchange, Verify Document Mod..., iTunes, and verify-user-guide-r2[...]. The system clock shows 3:09 PM.


2. Select “Log-in to CDX” in the blue panel on the left side of the page and enter your user name and your password on the CDX log-in page. (If you do not have a CDX account, see <http://www.epa.gov/otaq/verify/setup.htm> for the required steps to take).



3. Following log-in, your personal CDX page, the “MyCDX” page, will load. On this page, you should select “Verify: Upload Compliance Documents” under the “Available Account Profiles” box.



- Next, the page for submitting a document to Verify via CDX will load. You are now ready to enter the information needed for submitting DR/VERR Forms and Attachments to the Verify Document Module.



**U.S. Environmental Protection Agency**

**Upload EPA Compliance Documents From Manufacturer Workstation**

Logged in as, JOHNHENDON. Manufacturer: Environme... - EPA ([Logout](#))

[MyCDX](#) > Upload EPA Compliance Documents

Note:  
1. Required fields are marked with \* and cannot be left blank.

[Help](#)

<b>EPA Manufacturer Code *</b>	EPA
<b>Document Path and File Name *</b>	<input type="text"/> <a href="#">Browse...</a>
<b>Path and File Name of Same Document in Alternate Format</b>	<input type="text"/> <a href="#">Browse...</a>
<b>Industry *</b> (CTRL + Click to select multiple values)	<input type="checkbox"/> Marine Spark Ignited <input type="checkbox"/> Motorcycles <input type="checkbox"/> Nonroad Compression Ignition <input type="checkbox"/> Nonroad Motorcycles and/or ATVs <input type="checkbox"/> Small Nonroad Spark Ignited
<b>Compliance Document Type *</b>	Nonroad Small SI Confirmatory Testing Set-up Document
Compliance Document Type, if "Other"	<input type="text"/>
General Document Type	Select
General Document Type, if "Other"	<input type="text"/>
Compliance Document Topic	<input type="text"/>
Compliance Document Topic, if "Other"	<input type="text"/>
<b>Confidentiality Status *</b>	<input type="radio"/> CBI <input type="radio"/> FOIA
<b>Document Applicability *</b>	Select
<b>Does this document apply to one/multiple specific model year(s) *</b>	<input type="radio"/> Yes <input type="radio"/> No
Model Year (CTRL + Click to select multiple values)	<input type="checkbox"/> 2002 <input type="checkbox"/> 2003 <input type="checkbox"/> 2004
<b>Document Date *</b>	<input type="text"/> <a href="#">select</a>
<b>Title *</b>	<input type="text"/>
<b>Abstract *</b>	<input type="text"/>
<b>Keyword(s) *</b> (CTRL + Click to select multiple values)	<input type="checkbox"/> Absorber <input type="checkbox"/> Air cooled <input type="checkbox"/> Alternative Fuel <input type="checkbox"/> Alternative Fuel Converter <input type="checkbox"/> CARB
<b>Are you the document owner?</b>	<input type="radio"/> Yes <input type="radio"/> No
<b>Document Owner Name *</b>	<input type="text"/>
<b>Document Owner Phone *</b>	<input type="text"/>
<b>Document Owner E-Mail *</b>	<input type="text"/>
<b>Comments</b>	<input type="text"/>

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URL: <http://www.epa.gov/epahome/usenotice.htm>

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## DEFECT AND VOLUNTARY EMISSION REPORTS - VERIFY DOCUMENT MODULE SUBMITTAL PROCESS

### SUBMITTING DEFECT AND VOLUNTARY EMISSION RECALL REPORT FORMS AND ATTACHMENTS - INSTRUCTIONS FOR ENTERING INFORMATION IN THE VERIFY DOCUMENT MODULE

1. **EPA Manufacturer Code:** This field will be auto-populated based on the manufacturer code you entered during the CDX registration process.
2. **Document Path and File Name:** You can type in the filename or you can select “Browse” and locate the file on your computer. The file that is being uploaded must already be saved on the submitter’s workstation according to the [naming convention](#) shown at the end of this document, which is much simpler than the document naming convention shown on the Verify Document Module’s Help Page.
3. **Industry:** Select an industry from the pull-down menu. In the rare case that the DR/VERR you are submitting applies to multiple industries, you can select them all by holding down “Ctrl” on your keyboard and left click your mouse on each of the applicable industries.
4. **Compliance Document Type:** Within the pull-down menu, there are several options depending on the type of document you are submitting (e.g. report or attachments). Below are the different options for entering data in this field. From the pull-down menu, you should select:
  - a. “Defect Report (Report)” for submitting a defect report (DR);
  - b. “Voluntary Emission Recall Report” for submitting a voluntary emission recall report (VERR) or a VERR quarterly update report (QR).

#### **DO NOT SELECT THE “VERR QUARTERLY UPDATE” OPTION!**

This will be handled under the subsequent field, “General Document Type”; or

- c. “Other” for a *DR/VERR Attachment*. A text box will appear that you are required to enter data into since you selected “Other”. In this field, you should indicate what type of report (e.g., DR or VERR) that this attachment applies to and the applicable report number (e.g., “DR attachment – 3522” or “VR attachment - 0021”).
  - d. Note that attachments should not be submitted for QR’s. New documents that are created during the period covered by a QR should be submitted as an attachment to a revised VERR.
5. **Compliance Document Topic:** Data can only be entered in this field when you have selected “Defect Report (Report)” or “Voluntary Emission Recall Report” for “Compliance Document Type” (see paragraph 4c

above). Below are the different options for entering data in this field. Depending on the type of report you are submitting, you should select:

- a. "Initial Report" or "Follow-up Report" for submitting a DR, depending on whether you are submitting it for the first time or are correcting/updating an existing DR, respectively;
- b. "Notification of Voluntary Recall" or "Follow-up Report" for submitting a voluntary emission recall report (VERR), depending on whether you are submitting it for the first time or are correcting/updating an existing VERR, respectively;
- c. "Quarterly Update Report" for submitting a VERR quarterly update report (QR).

**DO NOT SELECT THE "REMEDIAL PLANS" OPTION!** The VERR includes the information that constitutes a remedial plan and, therefore, this option is not necessary.

6. **General Document Type:** Data can only be entered in this field when you have selected "Other" for "Compliance Document Type" (see paragraph 4c above). Select the appropriate entry from the pull-down menu.
7. **Confidentiality Status:** For manufacturers filing a report(s) for Light-Duty and Complete Heavy-Duty Vehicles and Trucks, you must select FOIA. For manufacturers filing a report(s) for Heavy-Duty or Nonroad engines, you may select CBI.
8. **Document Applicability:** Since manufacturers will be including the test group information on the report(s) submitted to the Verify Document Module, manufacturers should select "General Applicability (do not specify any EF/TGs)" for this field.
9. **Does this document apply to one/multiple specific model year(s)?:** In almost all cases, you should select "Yes" for this field. You will then be required to select the applicable model year(s) in the subsequent field. If Model Year is not applicable to your product or industry, please select "No".
10. **Model Year:** If the report applies to a single model year, please select the applicable model year. If the report applies to multiple model years, depress the "Ctrl" button on your keyboard and select each applicable model year.
11. **Document Date:** Click the "Select" button to bring up a calendar and then select the date of the report. (The submittal date will be automatically recorded by the system.)
12. **Title:** Enter the title of the document as it appears on the document you are submitting. For more guidance, you may click the "Help" button at the top of the form and follow the instructions given for this field.



13. **Abstract:** At the beginning of this field, you should enter the applicable DR or VERR number (e.g., 3522) to allow searching for a particular report.

Note that in the case of a QR that applies to more than one VERR, the VERR numbers that the QR applies to should be entered as a comma separated list.

Following the DR/VERR number, you may enter information that describes the document. For more guidance, you may click on the “Help” button at the top of the form and follow the instructions given for this field.

14. **Keywords:** For all report types (DR/VERR/QR), you should select “In-Use” at a minimum. For the VERR/QR, in addition to selecting “In-Use”, you should also select “Recall”.
15. **Are you the document owner?:** If the person submitting the document to the Verify Document Module is also the person that should be contacted regarding details in the document being submitted, you should check “Yes” for this field. The Verify Document Module will automatically enter the information for the document owner name, phone number and e-mail address in the appropriate boxes based on your Verify user account information. Otherwise, you should check “No” and enter the appropriate document owner’s name, phone number and e-mail address in the required text boxes.

This information, along with the Verify user account information, will be used to automatically populate the submitter and contact information in EPA’s database and for reference by the EPA. Therefore, please ensure the accuracy of this information when entering data.

16. **Comments:** You may enter any additional details or notes in this field that you feel are relevant and necessary. For more guidance, you may click on the “Help” button at the top of the form and follow the instructions given for this field.
17. As noted throughout these instructions, there is a Help button at the top of the page that will provide guidance for each field in the Verify Document Module submittal page.
18. **If you want to resubmit a document:** Each document that is submitted to the Verify Document Module must have a unique name. If you have to resubmit a document because it was not accepted by the Verify Document Module, you will have to rename the file with a unique file name. In this case you only need to add a lower case letter, starting with the letter “a” and incrementing upward in alphabetical order, at the end of the “Version Indicator” field. For example, if you submitted a file with a minor error in it named:

FOI\_ABC\_DRE\_0013\_BD\_R00.pdf

the corrected and resubmitted file should be renamed:

FOI\_ABC\_DRE\_0013\_BD\_R00a.pdf

If multiple resubmissions are required, increment the lower case letter for each successive resubmission (e.g., “a”, “b”, “c”).

**NOTE: This character is only necessary if a document you submitted was not accepted by the Verify Document Module. Otherwise, you may leave this character off of the file name.**

## Naming a Document File

A name of a document file consists of four sections:

**Confidentiality\_ Applicability\_ Information Type\_ Version Indicator. suffix [file type]**

Each section has multi-elements as listed in the following table:

<u>Section 1</u> <b>Confidentiality</b> (3 characters + underscore)	<u>Section 2</u> <b>Applicability</b> (3 characters + underscore)	<u>Section 3</u> <b>Information Type</b> (9 characters + 3 underscores)	<u>Section 4</u> <b>Version and Submission Indicator</b> (4 characters)
<ul style="list-style-type: none"> <li>• <b>CBI_</b> : a confidential file that will not be released to the public</li> <li>• <b>FOI_</b> : a non-confidential file after remove confidential information from a CBI file so that it is readily releasable to the public after your vehicles/engines are introduced into commerce</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Manufacturer Code_</b> : the three character code used by the manufacturer in <i>VERIFY</i></li> </ul>	<ul style="list-style-type: none"> <li>• <b>DRE_XXXX_BD_</b> : Defect report (1) (4)</li> <li>• <b>VER_XXXX_BD_</b> : Voluntary emission recall report (1) (4)</li> <li>• <b>QR#_YYYY_BD_</b> : Voluntary emission recall quarterly report (2)(3)(4)</li> </ul> <p><i>Notes:</i></p> <p>(1) "XXXX_" should be the four digits DR or VERR number assigned by the manufacturer.</p> <p>(2) "#" should be 1, 2, 3 or 4 indicating the quarter of the calendar year that the report applies to.</p> <p>(3) "YYYY_" should be the calendar year the report applies to.</p> <p>(4) "BD_" (Base Document) should only be changed to one of the following when a document is an <u>attachment</u> to a DR or a VERR:</p> <p style="margin-left: 20px;"><i>ED: Emissions Data</i> <i>DN: Dealer Notification</i> <i>ON: Owner Notification</i> <i>RI: Repair Instructions</i> <i>SB: Technical Service Bulletin</i> <i>SL: Sample Repair Label</i> <i>OT: Other</i></p>	<p><b>Version Indicator</b> (Characters 1-3)</p> <ul style="list-style-type: none"> <li>• <b>R00</b>: original</li> <li>• <b>R01</b>: 1<sup>st</sup> revision</li> <li>• <b>R02</b>: 2<sup>nd</sup> revision</li> <li>• ..... etc.</li> </ul> <p><b>Submission Indicator</b> (Character 4; optional: only required if you are resubmitting a document following an unsuccessful submission)</p> <ul style="list-style-type: none"> <li>• <b>RXXa</b>: 1<sup>st</sup> resubmission of same document</li> <li>• <b>RXXb</b>: 2<sup>nd</sup> resubmission of same document</li> <li>• ..... etc.</li> </ul>

Examples:

Reports submitted by manufacturer ABC:

**b1. Example Names for DR/VERR/QR Report Files**

<b>Application File Name</b>	<b>Name Explanation</b>
FOI_ABC_DRE_0013_BD_R02	Public file with CBI (Confidential Business Information) removed, for manufacturer ABC, Defect Report #0013, second revision.
CBI_ABC_VER_0014_BD_R00	File containing Confidential Business Information, for manufacturer ABC, Voluntary Emission Recall Report #0014, original version.
FOI_ABC_QR3_2009_BD_R00	Public file with CBI (Confidential Business Information) removed, for manufacturer ABC, Voluntary Emission Recall Quarterly Reports for 3Q 2009, original version.
FOI_ABC_DRE_0013_BD_R02a	Public file with CBI (Confidential Business Information) removed, for manufacturer ABC, Defect Report #0013, second revision, first resubmission following unsuccessful submission

**b2. Example Names for Attachments to DR/VERR Report Files**

<b>Application File Name</b>	<b>Name Explanation</b>
CBI_ABC_DRE_0013_ED_R00	File containing Confidential Business Information, for manufacturer ABC, Defect Report #0013, Available Emissions Data, original version.
FOI_ABC_VER_0014_SB_R00	Public file with CBI (Confidential Business Information) removed, for manufacturer ABC, Voluntary Emission Recall Report #0014, Technical Service Bulletin, original version.