

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



EPA must collect the information described here to ensure compliance with the Cross-Media Electronic Reporting Rule (CROMERR). This rule, finalized in October 2005, establishes provisions, procedures, and standards for electronically reporting various types of information to EPA. Further information on CROMERR can be found at www.epa.gov/CROMERR.

Verify Marine CI User Roles		
Verify Submitter	Submitter of Marine CI certification information (data and documents)	
CROMERR Signer	Requestor of Marine CI certificates, and the one who attests to the validity of submitted information.	
Company Authorizing Official (CAO)	Responsible for identifying, sponsoring, and managing Verify Submitters and CROMERR Signers.	

<u>EPA's Compliance Division (CD) must hold hard copy (wet ink signed) forms of the following documents before a manufacturer's Verify accounts can be created or activated.</u>

Required Documents for CROMERR Package		
Electronic Signature Agreement from Company Authorizing Official (CAO-ESA)	The Electronic Signature Agreement (ESA) from the Company Authorizing Official (CAO) identifies the company officer responsible for designating individuals with authority to represent the company and conduct company transactions through the Verify information system. This ESA must be signed by the CAO as well as the CAO's immediate supervisor or an official witness (such as a vice president or Director of Human Resources). The original completed document ("wet ink signed") must be sent to the Verify team by the US Postal Service or a package delivery service. Electronic files and telephone facsimiles will not be accepted.	
User Sponsor Letter and User Information	The CAO's ESA identifies and records the company official who is responsible for information submission to EPA. However, a company's CAO may wish to designate other users to carry out day-to-day interactions with the Verify information system: submitting files, requesting certificates of conformity, sending documents, etc. The CAO may designate others to perform these tasks by submitting a user authorization letter and user identification information. This letter must be sent to the Verify Team by the US Postal Service or a package delivery service. Electronic files and telephone facsimiles will not be accepted. Note: The User Authorization Letter must be signed by the same person submitting the Company Authorizing	

	Official (CAO) ESA
CROMERR Signer Electronic Signature Agreement (ESA)	The last required form is the CROMERR Signer electronic signature agreement. With this form each user agrees to abide by the rules of the Verify information system. EPA must receive a signed ESA for each CROMERR signer before their account can be activated. If the CROMERR Signer has already submitted an ESA for another Verify industry, we will use that ESA on file. CROMERR signers must send their ESAs to the Verify Team by the US Postal Service or a package delivery service. Electronic files and telephone facsimiles will not be accepted
	Note: A CROMERR Signer ESA must be received from every person who would like to request a certificate on behalf of their company, including a CAO (even though he has sent in a CAO ESA).

There are three possible scenarios that a user may fall into. Please select the correct scenario and make sure the appropriate documents are included in your CROMERR Package. The CROMERR should be mailed to the Verify Team

Scenarios	Actors	Steps	Additional Information
Scenario 1 - If a Marine CI submitter, requesting access to the Verify Marine CI and/or Request for Certificate modules,	For a Verify Submitter, the Company Authorizing Official (CAO) of their original CROMERR Package will need to:	1.) Create a sponsor letter for the Verify submitter	Sponsor letter must include the user names and their existing Verify user id(s) CAO must sign the sponsor letter The CAO should make request for any updates and deletions in a similar manner
currently has a Verify user account and the manufacturer has		 Complete the user spreadsheet with the Marine CI subsystem indicated 	
previously submitted a CROMERR package to EPA.		3.) Mail package to the Verify Team.	The CROMERR package should include: Sponsor Letter, User Spreadsheet
	For the Request for Certificate - CROMERR Signer, the CAO will need to:	Create a sponsor letter for the Verify submitter	Sponsor letter must include the user names and their existing Verify user id(s)

Scenarios	Actors	Steps	Additional Information
			CAO must sign the sponsor letter The CAO should make requests for any updates and deletions in a similar manner
		2.) Complete the user spreadsheet with the Verify-RFC CROMERR Signer and Marine Cl indicated	
		4.) Mail package to the Verify Team.	The CROMERR package should include: Sponsor Letter, and User Spreadsheet
Scenario 2 - If a Marine CI submitter does not have a Verify user account, but the manufacturer has	For a Verify Submitter, the Company Authorizing Official (CAO) of their original CROMERR Package will need to:	1.) Create a sponsor letter for the Verify submitter	Sponsor letter must include the user names CAO must sign the sponsor letter The CAO should make requests for any updates and deletions in a similar manner
already submitted CROMERR packages for another Verify industry to EPA		2.) Complete the user spreadsheet with the Marine CI subsystem indicated	
		5.) Mail package to the Verify Team.	The CROMERR package should include: Sponsor Letter, and User Spreadsheet.
	For the Request for Certificate - CROMERR Signer, the CAO will need to:	 Create a sponsor letter for the Verify submitter 	Sponsor letter must include the user names CAO must sign the sponsor letter The CAO should make requests for any updates and deletions in

Scenarios	Actors	Steps	Additional Information
		2.) Complete the user spreadsheet with the Verify-RFC CROMERR Signer and Marine CI indicated	a similar manner
		3.) Each user will need to complete an Electronic Signature Agreement (ESA)	
		6.) Mail package to the Verify Team.	The CROMERR package should include: Sponsor Letter, User Spreadsheet, and Users' ESAs
Scenario 3 -The manufacturer and users		Determine if your manufacturer code is in Verify	If your company is not registered in Verify, then you will need to request a manufacturer code.
are new to Verify	Identify your Company Authorizing Official and have a Senior Manager	The CAO must be a manufacturer employee	
	of your Company sponsor the Company Authorizing Official	1.) Create a sponsor letter for the CAO	Sponsor letter must include the CAOs names (it can also include the other user names) Manager must sign the sponsor letter
			The senior manager should make requests for any updates and deletions in a similar manner
		2.) CAO must complete a CAO ESA	
		Company Authorizing Official indicated	

Scenarios	Actors	Steps	Additional Information
		7.) Mail package to the Verify Team.	The CROMERR package should include: Sponsor Letter, User Spreadsheet, CAO ESAs. and Users' ESAs
	For a Verify Submitter, the Company Authorizing Official (CAO) of their original CROMERR Package will need to:	1.) Create a sponsor letter for the Verify submitter	Sponsor letter must include the user names CAO must sign the sponsor letter The CAO should make requests for any updates and deletions in a similar manner
		 Complete the user spreadsheet with the Marine CI subsystem indicated 	
		8.) Mail package to the Verify Team.	The CROMERR package should include: <u>Sponsor Letter</u> , and <u>User Spreadsheet</u>
	For the Request for Certificate - CROMERR Signer, the CAO will need to:	1.) Create a sponsor letter for the Verify submitter	Sponsor letter must include the user names CAO must sign the sponsor letter The CAO should make requests for any updates and deletions in a similar manner
		2.) Complete the user spreadsheet with the Verify-RFC CROMERR Signer and Marine CI indicated	
		 Each user will need to complete an Electronic Signature Agreement 	

Scenarios	Actors	Steps	Additional Information
		(ESA)	
		9.) Mail package to the Verify Team.	The CROMERR package should include: Sponsor Letter, User Spreadsheet, and Users' ESAs

After the Verify Team receives, evaluates, and approves the documents listed above, they will forward the approved submitter contact information to the Central Data Exchange (CDX) Help Desk where the user account information will be created. After entry, the Help Desk will then send each approved individual user a confirmation e-mail message, which will include a URL for registration completion and instructions telling the user to call the CDX Help Desk to complete the registration process.

Once the user calls the Help Desk, the Help Desk will call the user back at the phone number specified in the user information spreadsheet to authenticate the caller's legitimacy. At that time, the Help Desk will provide each user with a unique customer retrieval key (CRK), which is needed to complete the last step of the registration process.

In the final steps each user will go to the CDX web site located at the URL provided in the confirmation e-mail and enter the CRK in addition to other account information. Once the user registration process is complete, users will be logged in and may then immediately begin using the Verify information system.

If there are issues with your CROMERR package, you will be contacted by the Verify Team for a resolution.

Mailing Address for CROMERR Package	Verify Team, OAR/OTAQ/CD
	US EPA, NVFEL
	2000 Traverwood Drive
	Ann Arbor, MI 48105
CDX Help Desk Contact Information	E-mail address: helpdesk@epacdx.net
	Domestic telephone: 1-888-890-1995
	International telephone: 970-494-5500