

STATE RESPONSES TO ECOS CROMERR QUESTIONS

Draft – December 2009

Please identify any major issues your State encountered in the CROMERR application/approval process and how they were resolved.

- The issues that we faced while filling out the check list was that EPA technical reviewers could never guarantee us that anything we propose, even though it had their blessing, will finally be approved by the review committee. Thus we could not implement a system with any degree of certainty. However once EPA approved the NetDMR application for CROMERR compliance they indicated that any application that mirrored the NetDMR CROMERR application would be approved. It was smooth sailing after that.
- It is very easy to make the application (and hence the system) complicated for the user community. States should bear in mind that their clients are the users of their CROMERR compliant system (and not EPA) and that the users are not necessarily very accustomed to using computers. So the system should be made as simple and easy to use and comprehend as possible and yet CROMERR compliant. This is not easy to accomplish. However, communicating with the user community and getting feedback from them while making the application may help achieve this goal.
- We have not submitted yet but several of the requirements are excessive and unwarranted; there is not a driving business need for the strict submitter identity validation. Doesn't maximize use of existing state e-reporting systems. Modifications to existing state systems may be expensive.
- Lack of clarity from EPA on exactly what was required. Interpretation of the rule – EPA seemed to raise the bar with successive revisions to the application.
- We were uncomfortable having to tell EPA every 'secret' in the system since the application may be released under a FOIA request. We did not include some information even though EPA wanted the details. It was resolved in a verbal description and approved.

What do you think are the most common problems that states could avoid on their applications?

- The lack of certainty. Once it was resolved everything fell in place. Some States have issues with the knowledge based questions approach but that was never an issue for us. We implemented this approach successfully
- A successfully implemented solution means one that will be used by external customers and provides benefits to internal users.
- Don't take an approach/solutions that EPA has refused in other states.
- Unrealistic expectations; states should assume their application will be disapproved at least twice. Have a team; it is too much work and too much frustration for one person.
- Err on the side of providing too much information – EPA wants it all.

- Don't draft an application from scratch – review what other states have done and copy as much as possible.

Do you have a major issue or challenge that you and EPA have been unable to resolve and has prevented the approval of your application?

- No

Please provide your best advice or additional information that you would like to share with other states.

- Our best advice is to prepare an application mirroring any of the approved State's application, if possible.
- We found in reviewing other states' applications that the initial application alone is not as valuable as the application with EPA's responses or approved applications with comments.
- Start with another state's work. Don't do it alone. Contact other states.
- Do an informal review of your application/checklist first....turn-around time will be shorter.
- After any review is completed, request a one-on-one with one or more of the reviewers and go over every question you have in detail.
- Take the attitude that the EPA review staff is there to assist you in getting your application/checklist approved. They want you approved as much as you do.