



Electronic reporting at MWRA

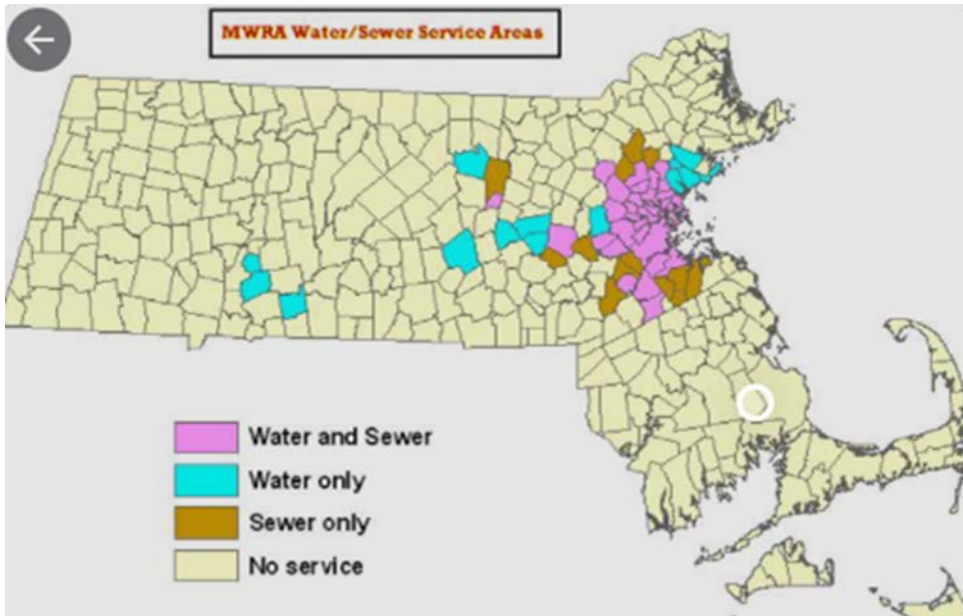


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MWRA- background



- 3.1 million people served
- 350 million gallons per day of sewage treated (average)
- 2,100 permitted sewer users
- 190 Significant Industrial Users
- 5,400 miles of local sewers,
- 228 miles MWRA interceptor sewers
- 2 MWRA wastewater treatment plants serving 45 cities/towns



Cross-Media Electronic Reporting Rule (CROMERR)

- Promulgated in October 2005
- Codified under 40 CFR part 3
- Sets standards for electronic reporting to include identity proofing, electronic signatures, and integrity of electronic documents.



What is the function of CROMERR?

- Authorizes and facilitates electronic reporting for EPA programs
- Maintains the level of corporate and individual responsibility and accountability that exists for paper.

The process of CROMERR

- Validates the electronic signature;
- Determines the identity of the individual uniquely entitled to use a signature device; and
- Opportunity for user to review and reject the Copy of Record (COR)



Why CROMERR applies to MWRA?

- MWRA oversees the Industrial pretreatment program. MWRA is an entity acting as a regulator.
- The data submissions are required by the EPA
- MWRA wants to receive submissions electronically
- The submissions are accepted in lieu of paper



How to comply?

MWRAs existing Management System receives electronic data.

- MWRA partnered with EPA Shared CROMERR Services (SCS) to provide.
 - Registration Management (LexisNexis)
 - Identity Management
 - Electronic Signatures
 - Copy of Record
- MWRA hired a contractor to build the interface for the 2 systems
- Outreach/issues



Registration and Identification

- User must create an account in Web SMR
- MWRA creates Web SMR account and sponsors the user for EPA SCS account
- User is sent link to register for EPA SCS
- Identity is checked through Lexus-Nexus
 - Social Security Number (automatic verification)
 - User fills out, signs form, sends to MWRA (manual authorization)

