



CROMERR Success Story Texas CEQ NetDMR

The Texas Commission on Environmental Quality (TCEQ) received approval from EPA, under the Cross-Media Electronic Reporting Regulation (CROMERR), for modification to their approved Texas Pollutant Discharge Elimination System (TPDES) program to allow electronic reporting for their Net Discharge Monitoring Report (NetDMR) system. The TCEQ NetDMR receives CROMERR “priority reports” with electronic signatures.

TCEQ NetDMR is based on EPA’s national NetDMR system, and is the first such state system to receive CROMERR approval. EPA’s national NetDMR system was created to receive electronic discharge monitoring reports (DMRs) from regulated facilities and transfer the reported data to EPA ICIS-NPDES system. The NetDMR model was created through a joint effort of Texas, EPA, the Environmental Council of the States (ECOS), and other states. The effort was funded by two U.S. EPA Environmental Exchange Network grants to Texas and Illinois and by the Connecticut Department of Environmental Protection as part of a Supplemental Environmental Project. The NetDMR model can be implemented by US EPA and any state or local government with the authority to accept DMRs.

The Texas Solution to Meeting CROMERR Requirements

The TCEQ NetDMR uses a variety of business practices and system functions to meet CROMERR requirements that are based on the national NetDMR system. The system provides for identity proofing by requiring a wet-ink signature agreement. The signature device is a user-generated password combined with a system-generated salt. The system achieves two-factor authentication by using the challenge question approach. At registration, users provide answers to 5 questions that they can answer based on personal information known only to them that cannot be easily guessed by someone else, and the questions and answers are one-way hashed in the same way as the passwords. When a user signs a document electronically, in addition to providing the correct password, one of the 5 questions is selected at random, and the user must provide the correct response to be authenticated. Electronic data, such as submitted reports,

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passwords, and answers to challenge questions, are protected during transmission by Secure Socket Layer (SSL) technology. Basing the approach to CROMERR compliance and the CROMERR application on the nationally approved NetDMR streamlined the CROMERR approval process for TCEQ.