

# EPA's initiative for Internet-based RMP submissions

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# EPA's initiative for web-based RMP submissions

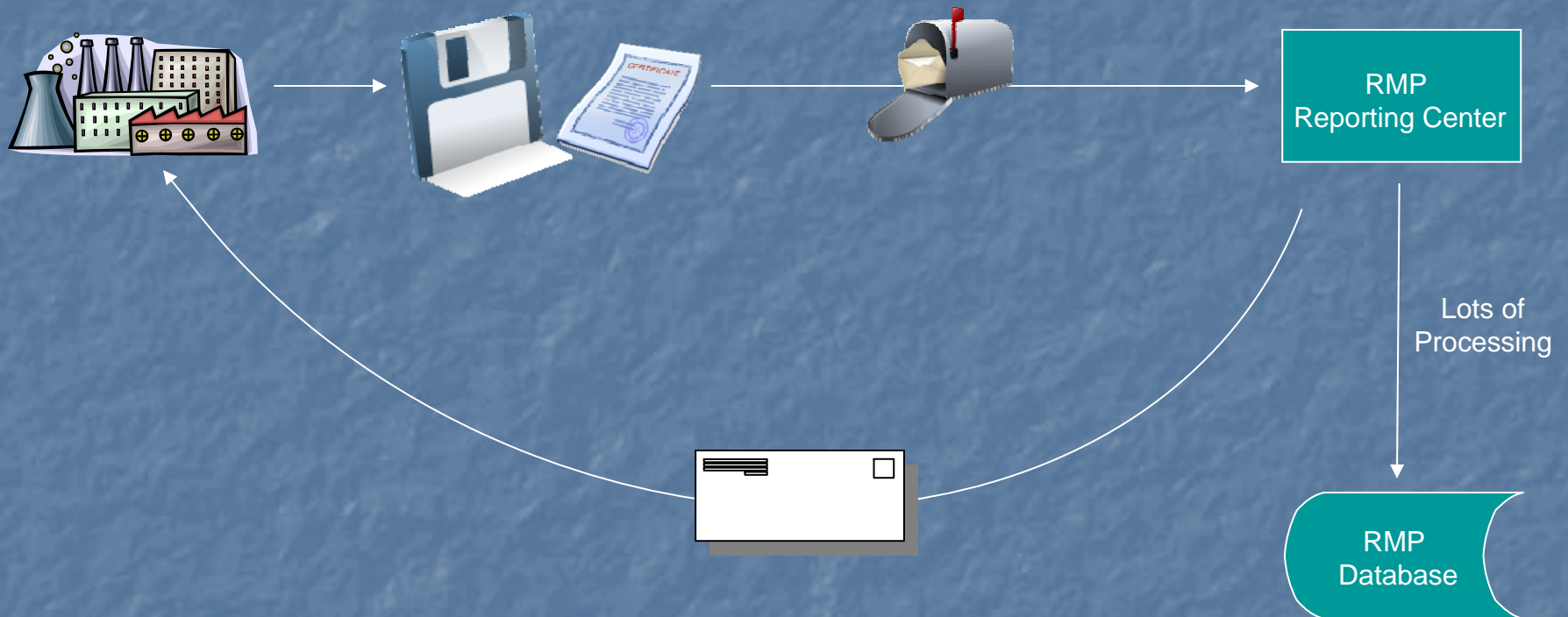
## Brief history of RMP submissions

- First RMPs were due June, 1999
- We received RMPs from around 15,000 facilities
- Nearly all facilities used RMP\*Submit
- Other methods were third-party software, and paper
- Most, but not all facilities had to resubmit in June 2004
- We received updated RMPs from around 10,000 facilities
- All facilities were required to update their emergency info in June 2004
- Web-based tool: RMP\*WebRC for minor corrections/updates
- ~3,000 facilities have registered to use RMP\*WebRC
- We expect to receive 8,000 updated RMPs in 2009
- RMP\*WebRC insufficient – updates only Section 1 of RMP
- New web-based tool planned for complete RMP submissions



# EPA's initiative for web-based RMP submissions

## Current system: RMP\*Submit



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## Disadvantages of RMP\* Submit

- Limited validation
- Facilities often lose their last submission
- Heavy processing load with manual steps
- Cumbersome mail back notification and resubmission cycle
- New Certification Letter for each submission
- Security issue: mailing of sensitive data



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## New system: RMP\* eSubmit RMP Submission via the Internet



### Key Points:

- EPA's Central Data Exchange (CDX)
- EPA's Electronic Signature protocol
- Preparer and Certifier
- Web form pre-populated with latest RMP
- Complete validation



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## Central Data Exchange (CDX)

- EPA's secure portal for entering and retrieving information
- Thirteen systems currently using CDX:
  - AQS, eBeaches, eIUR, LEAD, NEI, NESHAPS, PMN, RCRA, SDWIS, TRI-ME, TSCA, UCMR2, RMP\*WebRC
- Facilities will use CDX to gain access to RMP\*eSubmit



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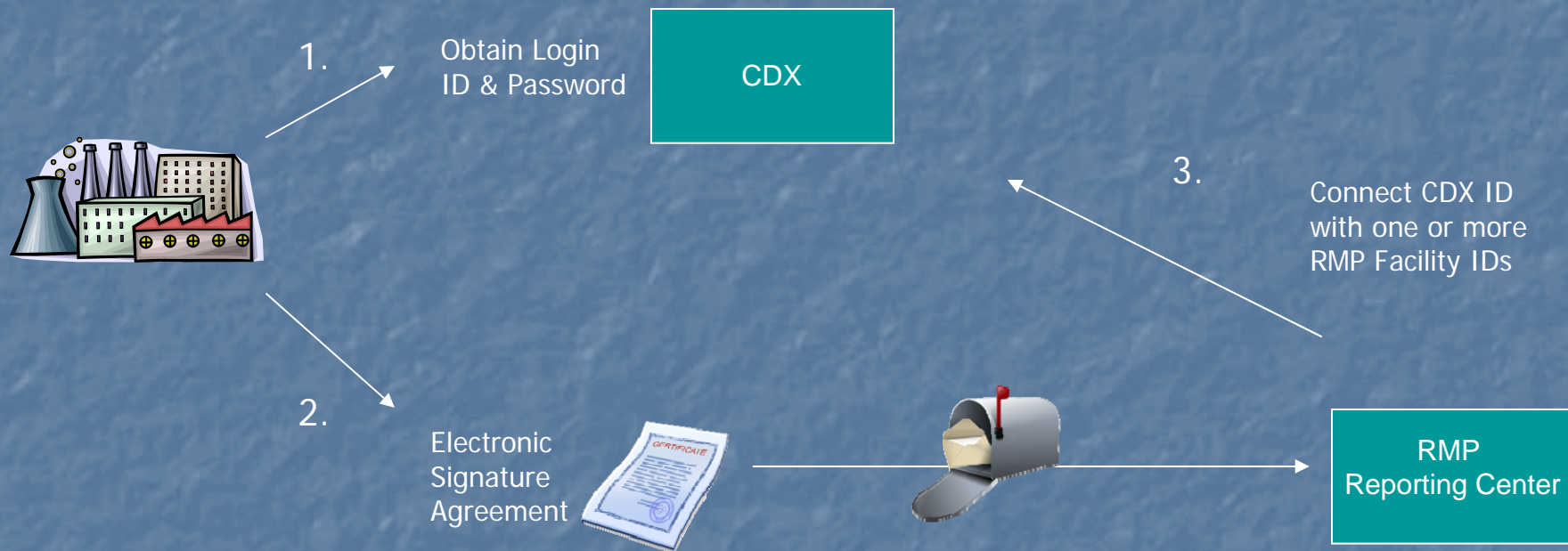
## EPA's Electronic Signature Protocol: CROMERR

- Cross-Media Electronic Reporting Regulation
- Sets standards for systems that EPA, states, tribes, and local governments use to receive electronic reports from facilities regulated under EPA-authorized programs.
- EPA's Office of Enforcement wanted standards stringent enough to hold up in court. Reasonable approach chosen.
- Fifteen States are now using an online system for Tier2 submissions. How are they dealing with the electronic signature issue?



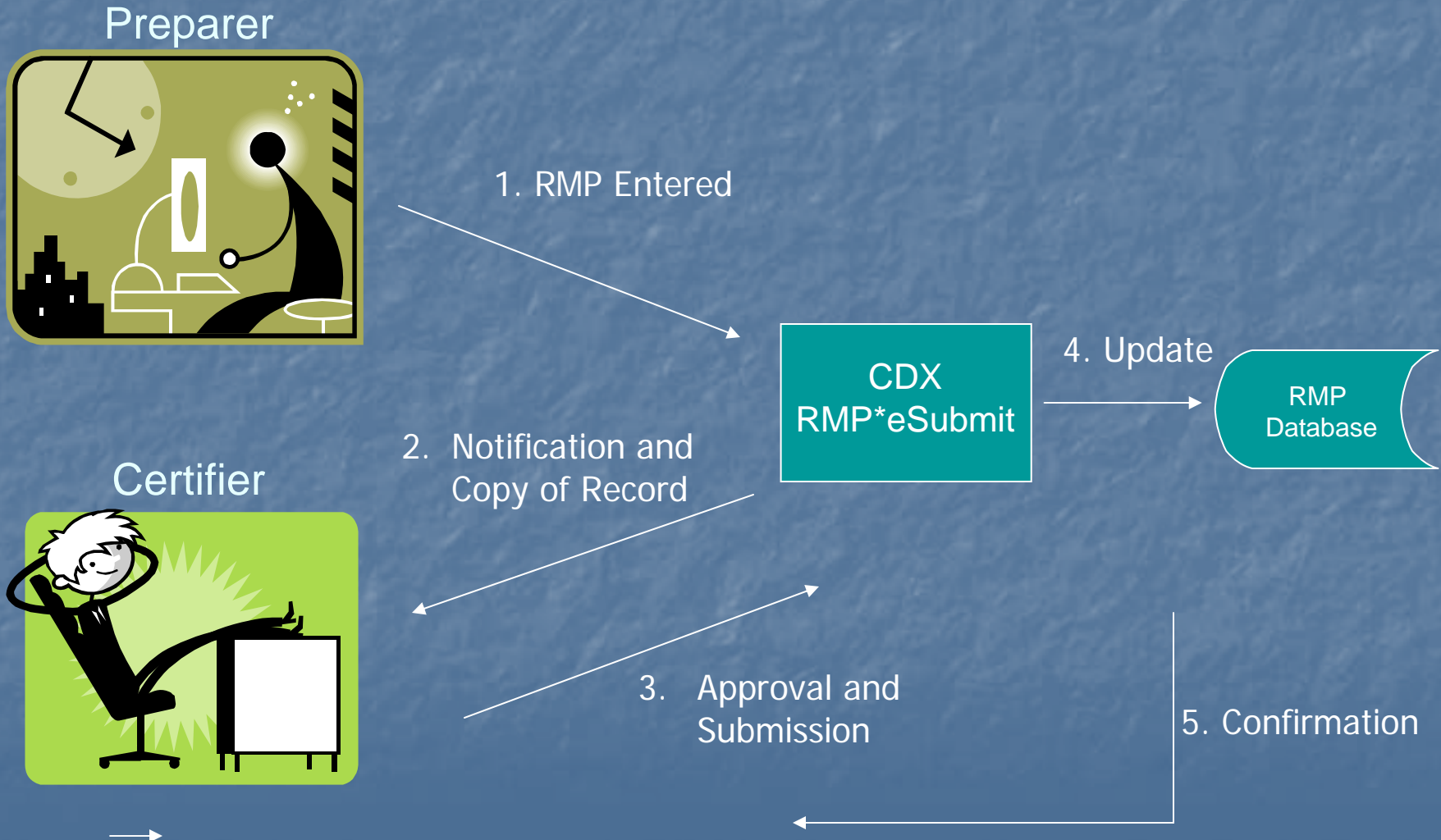
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## How the Electronic Signature Process Will Work



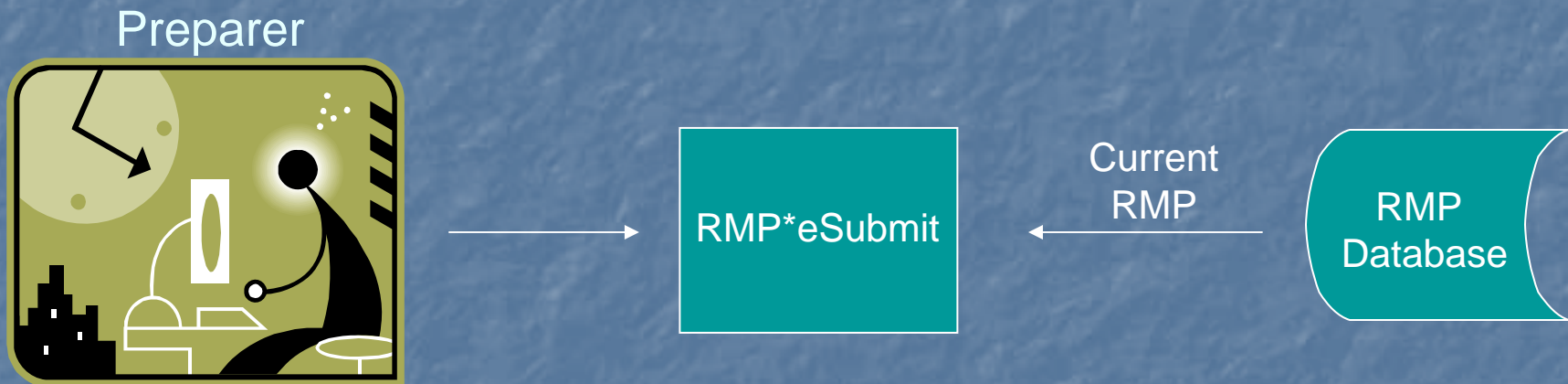
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## How the RMP Submission Process Will Work



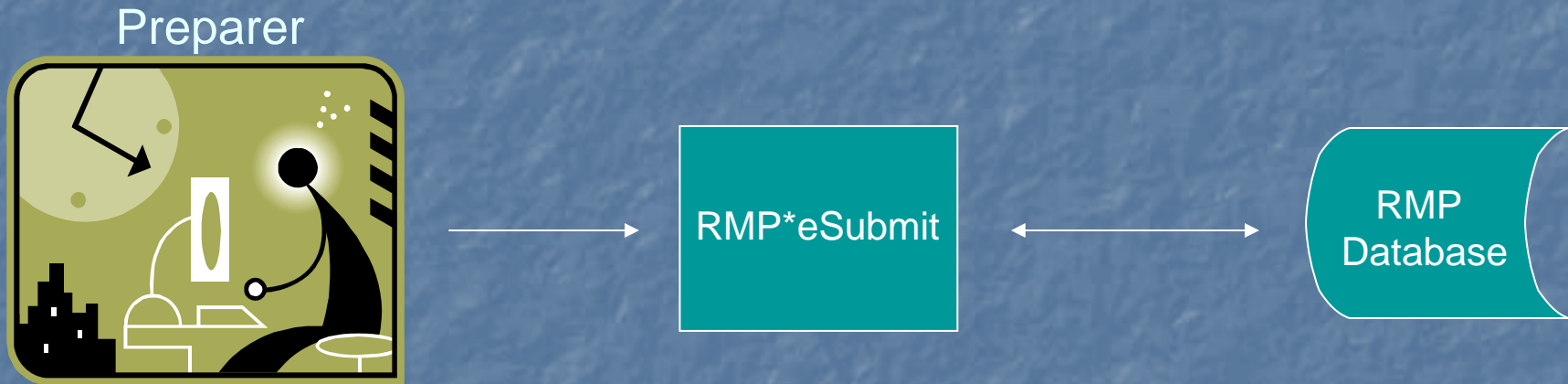
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RMP\*eSubmit screens are pre-populated with latest RMP



# EPA's initiative for web-based RMP submissions

RMP\*eSubmit can perform additional validations



- Correction vs. full resubmission
- Validation of submission type
- Validation of certain date fields based on previous RMP



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## Transition to RMP\*eSubmit

Can facilities continue to use RMP\*Submit?

- RMP\*Submit will be removed from our website
- No assistance in obtaining and using RMP\*Submit will be provided
- Target date: January 2009 (to coincide with availability of the new system)
- Facilities can use the 2004 version if they have it
- We will accept those submissions if they are without error
- Corrections will have to be made via RMP\*eSubmit
- Exception: CBI



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## Schedule

- RMP\*eSubmit beta test available – **October 2008**
- RMP\*eSubmit production system – **January 2009**
- Accommodate CBI – **September 2009**
- No longer accept submissions from RMP\*Submit – **January 2010**

End