



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY  
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OFFICE OF  
AIR AND RADIATION

CISD-11-05 (LDV/LDT/ICI/LIMO)

April 15, 2011

**SUBJECT: New Electronic Reporting System for Emission Defect Information, Voluntary Emission Recall, and Quarterly Progress Reports**

Dear Manufacturer:

Under Section 207 (a)(1)(B) and (c) of the Clean Air Act and the regulations in 40 CFR §85.1903 and §85.1904, manufacturers are required to submit an emission defect information report (EDIR), voluntary emission recall report (VERR), and quarterly progress report for voluntary emission recalls (Quarterly Report or QR) to the United States Environmental Protection Agency (EPA) when a defect is identified and/or must be remedied on twenty-five or more vehicles or engines within a class or category. EPA is authorized to collect EDIR, VERR and QR information under EPA Information Collection Request (ICR) number 0282.15, Office of Management and Budget (OMB) control number 2060-0048, approved on October 19, 2010.

Currently, manufacturers are submitting this information to EPA in many formats and via several distribution methods and this creates an undue burden on the EPA and manufacturers to collect and maintain this information. Therefore, in accordance with the Sections 1703 and 1705 of the Government Paperwork Elimination Act (GPEA), P. L. 105-277, Title XVII signed into law on October 21, 1998, EPA will implement an electronic method of collecting EDIRs, VERRs and QRs (EDIR/VERR System) in order to reduce the amount of financial and human capital related to the existing EDIR/VERR process and to receive EDIR/VERR information from all manufacturers through a single, secure submission source. In addition, we feel this will also reduce some burden on the manufacturers by providing a consistent format for submitting EDIR/VERR information and a method for re-using submitted information on future submissions or updating previously submitted information. It will also help expedite our assessment of these reports in conjunction with our certification review activities.

The new EDIR/VERR System will be implemented **sixty calendar days** after the date at the top of this letter. Once implemented, this new EDIR/VERR System will eliminate the need to submit paper copies of defect, voluntary recall, emissions recall quarterly updates and any related, supporting documentation. If you submit paper copies of defect and voluntary recall reports prior to implementation of the electronic system, you are required to send any follow-up reports in paper copy as well (e.g., a defect report that requires a voluntary emission recall report or a voluntary emission recall report that requires six emissions recall quarterly reports) until any follow-up requirements are satisfied. What follows is an overview of the EDIR/VERR Submittal Process and the instructions for how to access the EDIR/VERR System' data input forms and the

form submittal process.

The new EDIR/VERR System allows you to submit EDIR/VERRs in electronic format through EPA's Verify System. The Verify System uses the EPA Central Data Exchange (CDX) which is EPA's single source for securely collecting electronic data from local governments and agencies, private industries, state governments, and tribes. You may go to the following web page <http://www.epa.gov/otaq/verify/index.htm> for more information about EPA's Verify System.

The first step in the process is to save electronic versions of the data input forms used in the EDIR/VERR System to your desktop. We worked with manufacturers to develop these data input forms in Adobe Acrobat format and you can download the latest version of them from the document section of the Verify webpage at <http://www.epa.gov/otaq/verify/publications.htm>. The data input forms will allow you to cut and paste information from other applications and can be saved, unedited or with submitted information, to your desktop. To ensure that you have the correct version, please check in the lower, left hand corner of each form for the date and version number of "3/2011, Version 1.0".

Next, you must enter complete information into the forms and save the completed version of the form on your desktop for your records and for submission to EPA. Finally, you can submit the completed forms saved on your desktop to EPA using the Verify Document Module. For this step, you are required to have a valid Verify user account and a registered manufacturer code in the Verify System. The Verify System webpage above provides instructions on how to obtain a valid, registration user account and registered manufacturer code if you require one.

In addition to the forms, we have developed manuals that step you through the overall EDIR/VERR process ("A Step-By-Step Manufacturer Guide for Form Acquisition, Data Entry and Report Submittal for the New EDIR/VERR Process", November 2010) and the submittal process for the Verify Document Module ("Guidance for Submitting Emission Defect Information Reports and Voluntary Emission Recall Reports to the Verify Document Module", November 2010). They provide step-by-step instructions and some examples of EDIR/VERR Forms and Verify Document Module entries based on the type of report or document you are submitting. These manuals can also be found in the document section of the Verify webpage mentioned above.

Prior to implementation of the new EDIR/VERR System, EPA will hold a manufacturer webinar to discuss and demonstrate the system. If you have questions or concerns prior to the webinar regarding the information and timing discussed in this letter, please contact Arvon L. Mitcham ([mitcham.arvon@epa.gov](mailto:mitcham.arvon@epa.gov) or (734) 214-4522) of my staff or your EPA certification team representative.

Sincerely,

A handwritten signature in black ink, appearing to read 'Karl J. Simon', with a stylized flourish at the end.

Karl J. Simon, Director  
Compliance and Innovative Strategies Division  
Office of Transportation and Air Quality