

# EDT Implementer Tests Required for Authorization to use Production CERS EDT

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CERS EDT Implementers must successfully perform and document to CalEPA a series of tests for each [CERS EDT Service Tier](#) before being authorized for production use of an EDT Tier(s). This document describes these required tests and how an EDT Implementers should document and request authorization to use production EDT services from CalEPA’s Unified Program Technology Services staff (TSU). Successful completion of these tests demonstrates the implementer’s ability to correctly call a service endpoint, implement business rules that are not captured in the XML schema or other CERS data validation processes, and avoid endpoint misuse/overuse that would adversely impact CERS servers and /or other CERS EDT users.

After TSU has reviewed and confirmed the successful test results, the EDT Implementer will be shown on the [CERS EDT Home Page](#) as authorized for production use of the applicable EDT tier(s). In no way should this authorization be represented or interpreted as a general endorsement by CalEPA of a system/product.

This document assumes the reader is already familiar with CERS, CERS EDT, and has a testing account(s) already established in the CERS “Staging” environment. Please refer to the [CERS EDT Home Page](#) for more information.

Questions on this document should be directed to CERS Technical Support ([CERS@calepa.ca.gov](mailto:CERS@calepa.ca.gov)).

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## How to Report Test Results

An EDT implementer requesting authorization from CalEPA for production use of one or more EDT Service Tier(s) must:

- 1) Successfully conduct the tests specified in this document for the requested EDT Tier(s).
- 2) For each successful test, record the EDT Transaction Key so CalEPA can review/confirm the test.
- 3) Send an email to TSU indicating you have successfully completed tests for the specified EDT tiers. The email should then list in the both of the email or an attached spreadsheet a listing of each Tier(s) test number, the CUPA the test was performed under, and the associated EDT Transaction Key for your successful test.

The EDT Transaction Keys are available either from the data recorded during the EDT transaction into the local regulator data system, or by reviewing the test CUPA's EDT transaction history in the Staging Environment's Regulator Portal (see below).

The screenshot displays the 'California Environmental Reporting System: Regulator' interface in a 'Staging' environment. The user is logged in as 'Chris Allen'. The main navigation bar includes 'Submittals', 'Facilities', 'Businesses', 'Regulators', 'Compliance', 'Responders', and 'Reports'. The 'Regulators' tab is active, showing the 'Regulator: San Diego County Department of Environmental Health'.

The 'Electronic Data Transfer (EDT) Dashboard' is visible, containing sections for 'EDT Status (Staging Environment)', 'Authorized EDT Services for this Regulator', and 'EDT Access Accounts'. The 'EDT Status' section shows 'Regulator Code: 3700' and 'EDT Enabled: Yes'. The 'Authorized EDT Services' section lists six tiers with checkboxes: Tier 1 (checked), Tier 2 (checked), Tier 3 (checked), Tier 4 (unchecked), Tier 5 (unchecked), and Tier 6 (unchecked).

The 'EDT Access Accounts' table lists users and their access to various tiers. A red callout '2) Select EDT' points to the 'EDT' link in the left sidebar. Another red callout '3) Select Transaction Search' points to the 'Search' button in the 'Recent EDT Transaction History' section.

The 'EDT Transactions' section shows search criteria and a list of transactions. A red callout 'Use filters as' points to the search criteria fields. A red callout 'Select "Details"' points to the 'Details' button for a transaction.

The 'EDT Transaction Details' window shows the 'Transaction Key' as '94bb1315-f52b-4c5e-8a65-5af77c6a332c'. A red callout 'Provide Transaction Key to Cal/EPA TSU' points to this key.

TSU may ask you to repeat certain tests if it appears the conditions/intent of the test were not met.

## Tier 1: Regulator EDT Library Services

No tests required. CalEPA assumes these endpoints will only be occasionally used to populate/update a local copy of these data stores. TSU may contact EDT implementers if they see an ongoing pattern of excessive use of these endpoints.

## Tier 2: Regulator EDT Query Services

Implementers must demonstrate successful use of at least the following three endpoints:

### Regulator Facility Submittal Query

- 1) Perform at least five (5) successful transactions using at least the *status* parameter (typical usage would be to query for *Submitted* and *Under Review* status) and the *submittedOnStart/submittedOnEnd* or *submittalActionOnStart/submittalActionOnEnd* parameters.

### Regulator Facility Query

- 2) Perform at least two (2) successful transactions using the *CERSID* filter.
- 3) Perform at least two (2) successful transactions using the *createdOnStart* and/or *createdOnEnd* parameters.

### Regulator Facility Submittal Document Query

- 4) Perform at least three (3) successful transactions (i.e., document retrievals) based on *CERSUniqueKeys* acquired from the Regulator Facility Submittal Query transactions in Test #1.

## Tier 3: CUPA EDT CME Submission Services

Implementers need to demonstrate successful transactions against the [Regulator CME Submit](#) endpoint as described below. Each test should be conducted in a separate EDT Transaction.

- 1) Create at least 2 Inspection records with no Violations.
- 2) Create at least 2 Inspection records, each with 2 or more Violations.
- 3) Update at least 2 previously created Inspection records with at least an updated [Date Returned to Compliance](#) field.  
Note: Resubmit updated Inspection data using the previous transaction's *InspectionRegulatorKey* and a later *RegulatorActionDateTime* value.
- 4) Delete at least 2 previously created Inspection records.  
Note: Resubmit using the previous transaction's *InspectionRegulatorKey* and *Data Entry Status* set to 3 ("Deleted"). CERS will automatically delete any Violations associated with the inspection, along with any *EnforcementViolation* records associated with these deleted violations.
- 5) Delete at least 2 Violation records.  
Note: Resubmit using the previous transaction's *ViolationRegulatorKey* and [Data Entry Status](#) set to 3 ("Deleted"). CERS automatically deletes any *EnforcementViolations* records associated with these deleted violations.
- 6) Update at least 2 Violation records with updated [Violation Actual Return to Compliance Date](#) and [Violation Actual Return to Compliance Qualifier](#) fields.  
Note: Resubmit updated Violation data using the previous transaction's *ViolationRegulatorKey* and a later *RegulatorActionDateTime* value.
- 7) Create at least 3 Enforcement Action records. At least two of these Enforcement Action records should include creation of 1 or more *EnforcementViolation* records which are appropriate to the Enforcement Action's [Program Element](#) (e.g., UST Violation for a UST Enforcement Action).
- 8) Update at least 2 Enforcement records.  
Note: Resubmit inspection data using the previous transaction's *EnforcementRegulatorKey* and a later *RegulatorActionDateTime* value.

- 9) Create and/or delete at least two EnforcementViolation records for an existing Enforcement record.

Note: Resubmit EnforcementViolation data using the previous transaction's *EnforcementViolationRegulatorKey*, the appropriate value in the [Data Entry Status](#) field, and a later *RegulatorActionDateTime* value.

- 10) Delete at least 2 Enforcement records.

Note: CERS automatically deletes any EnforcementViolation records associated with the Enforcement Action.

## Tier 4: CUPA EDT Facility Submittal Review Services

Implementers need to demonstrate at least one successful EDT transaction for each scenario shown below against [Regulator Facility Submittal Action Notification](#) endpoint.

- 1) Submitted → Under Review
- 2) Submitted → Accepted
- 3) Submitted → Not Accepted\*
- 4) Accepted → Not Accepted\*

\* [SubmittalActionComments](#) field must explain why the submittal was *Not Accepted* and next steps for the facility owner/operator.

## Tier 5: CUPA EDT Facility Management Services

### [Regulator Facility Create](#)

- 1) Add at least two new facilities that **do not have an existing organization** in CERS.
- 2) Add at least two new facilities for an **existing** CERS Organization (i.e., populate *OrganizationCode* field [[CDR #20.0015](#)]).
- 3) Add at least two different new facilities that have physical addresses that duplicate an existing CERS ID but legitimately should have a separate facility/CERS ID (e.g., different cell tower instance at a shared facility). You will need to set the *IgnoreExactDuplicateAddressWarning* field ([CDR #20.0122](#)<sup>1</sup>) to "True". In normal operations all facilities intended to be created via this endpoint must first be searched for existing/duplicate records in CERS using the [Regulator Facility Query](#) endpoint or an equivalent manual search.

### [Regulator Facility Metadata Submit](#)

There are several different types of facility metadata that can be updated using this service: [facility geocoordinates](#), [FacilityID](#), [FacilityRegulatorKey](#), and the [Reporting Requirement](#) and [Next Due Date](#) per submittal element. For testing purposes, CalEPA is only requiring the following tests for modifying a facility's Reporting Requirement.

- 4) To indicate a facility is no longer regulated **at all** under the Unified Program, submit a transaction that sets the Reporting Requirement ([CDR #20.0088](#)) for an existing regulated facility's *Facility Information* submittal element to "Not Applicable". Note setting this status on the *Facility Information* element will cause CERS to automatically set the Reporting Requirements for **ALL** other elements to "Not Applicable" as well.

<sup>1</sup>The identifier of this field is mislabeled as CDR field #20.105 in the <documentation> element of the 1.05 version of RegulatorFacilityCreate.xsd

- 5) For a different facility, change its *UST* Reporting Requirement from “Applicable” or “Not Applicable” to “Always Applicable”.

## Tier 6: CUPA EDT Facility Submittal Submission Services

Read the instructions for using the [Regulator Facility Submittal Submit](#) endpoint.

### 1) "Typical" Pass-Through Submittal Test A

In a single EDT transaction, submit both *Facility Information* and *Inventory* submittal elements. For this test the *Inventory* submittal element's *Site Map* resource should be fulfilled with a document upload. The *Inventory* should also include an uploaded file for a *Locally-Required Documentation* resource. You will likely need to contact TSU to establish a downloadable local reporting requirement for your regulator's *Inventory* submittal element in the CERS “Staging” environment.

### 2) "Typical" Pass-Through Submittal Test B

For a different CERS ID than Test 1 above: In a single EDT transaction submit both *Facility Information* and *Inventory* submittal elements. For this test the *Inventory* submittal element's *Site Map* resource should be fulfilled using the "Public URL" document option, and a *Locally-Required Documentation* resource element should be fulfilled using the "Exempt" document option.

### 3) Typical Proxy Submittal Test 1

In a single EDT transaction submit a *Facility Information* submittal element with some number of fields edited from a previous submittal. Ensure the submittal element is properly coded as a Proxy submittal.

### 4) Typical Proxy Submittal Test 2

For a different CERSID than Test 3 above: In a single EDT transaction submit an *Inventory* submittal element that has at least one material edited from a previous submittal. This will require including the a *Site Map* resource for the *Inventory* element, as well as inclusion of a *Facility Information* submittal element. Ensure both submittal elements are properly coded as Proxy submittals.

### 5) Proxy Notification Business Process

Provide a brief written description to CalEPA of how the local data system will assist regulators in meeting the requirement of sending an electronic or postal communication to the owner/operator of facility for which a regulator makes a proxy submittal. This might be an automated email to the facility owner/operator, an automated email or other notification to regulator users to send such a communication to the facility owner/operator, a prominent alert/warning in your system's user interface, a report in your system regulators would access periodically to review and generate such proxy submittal communications, or some other mechanism. CalEPA does expect the local data system will provide some type of automated aid to regulator users to fulfill this communication requirement, and if appropriate, to assist regulators in providing an audit trail to CalEPA evaluators that the requirement was met (e.g., a report showing automated communications to facility owner/operators).

### 6) Complete Pass-Through Submittal

In three different EDT transactions for different CERS IDs, submit an EDT Transactions that includes ALL nine submittal elements with EVERY field on every form completed and all supplemental documentation resources handled as document uploads. Ensure each submittal element includes a *Miscellaneous Statewide*

Documentation element, and that at least two of the submittal elements (excluding Inventory which was tested in Test 2) include locally-required documentation resources. For the Tiered Permitting submittal element, at least one unit must be a "CA" unit, which triggers several additional resources specific to "CA" units.