

NPDES Electronic Reporting Rule Phase 2 Implementation Plan

Missouri Department of Natural Resources

Date

Implementation Plan Purpose

On 22 October 2015, the United States Environmental Protection Agency (USEPA) published the final National Pollutant Discharge Elimination System (NPDES) Electronic Reporting (eReporting) Rule [40 CFR Part 127, 80 FR 64063]. This regulation requires the electronic reporting and sharing of Clean Water Act NPDES program information instead of the current paper-based reporting of this information.

The NPDES eReporting Rule allows states to determine what electronic reporting tools and systems work best for them and whether they would like to be the initial recipient of NPDES compliance monitoring data. USEPA does not dictate the electronic reporting tools that a state may use. Rather, USEPA sets performance requirements for states that wish to build their own electronic reporting tools. States also have the option of using and, if desired, customizing electronic reporting tools developed and maintained by USEPA. A state that is the initial recipient for an NPDES data group must submit an implementation plan to USEPA for review to ensure that the authorized NPDES program will meet the Phase 2 electronic reporting deadline. This plan must provide enough details (e.g., tasks, milestones, roles and responsibilities, necessary resources) to clearly describe how the program will successfully implement electronic reporting of Phase 2 data. This plan does not include electronic reporting of Discharge Monitoring Reports (DMRs).

In accordance with 40 CFR 127.26(h), authorized NPDES programs must submit an Implementation Plan (IP) to USEPA for review by 21 December 2016. USEPA will inform the authorized NPDES program if the implementation plan has enough detail to ensure successful implementation of electronic reporting for Phase 2 data. Completed IPs can be emailed to EPA using the following email address: NPDESElectronicReporting@epa.gov.

1. Overview/Executive Summary

The department currently utilizes a database to house NPDES permit information, called the Missouri Clean Water Information System (MoCWIS) and has transmitted that data to USEPA prior to the rule implementation. Since 2012, the department has had an electronic application and permit issuance system called ePermitting that is currently being used for Missouri's Land Disturbance/Construction Permit MO-RA00000. Starting in 2013, the department implemented an electronic DMR system for facilities to enter data. A number of other Information Technology (IT) projects are scheduled and described below to further comply with the NPDES eReporting Rule.

The department's Water Protection Program, Operating Permit Section has been tasked with drafting this implementation plan and they may be contacted at 573.522.4502 or by email at edmr@dnr.mo.gov.

2. Agency NPDES Universe

Missouri has 11,453 active (effective or expired) NPDES permits, all of which are batched to USEPA's ICIC-NPDES database. This includes 2,763 site-specific (individual) permits and 8,690 are General Permit Covered Facilities, of which approximately 5,180 permits are required to submit discharge monitoring reports. The General Permit Covered Facilities fall under one of 44 Master General Permit templates. In addition, Missouri has 613 state-only permits that are not NPDES and are not transmitted to USEPA's ICIC-NPDES database.

NPDES Electronic Reporting Rule Phase 2 Implementation Plan
Missouri Department of Natural Resources

Date

A. Number of Active and Administratively Continued Site-specific NPDES Permits as of 30 September 2016:

NPDES Permit Type	Total
Major Individual	176
Minor Individual	2,370
MS4	4
CAFO	21
Industrial Stormwater	192
Total of all Site-specific	2,763

B. Number of Active and Administratively Continued NPDES General Permit Covered Facilities as of 26 October 2016:

MGP #	MGP Title	Expiration	GPCF #s
MOG010000	CAFO	23-Feb-18	44
MOG050000	Abandoned Mine Lands	30-Jun-21	3
MOG090000	Ag/Wood/Food Compost Sites	13-Dec-17	3
MOG130000	Flow Through Aquaculture	31-Dec-18	12
MOG140000	Oil/Water Separator	30-Jun-19	33
MOG251000	Discharging Ground Source Heat Pumps	16-Sep-15	4
MOG350000	Petroleum Storage	10-Jul-17	193
MOG490000	Limestone Quarries	05-Oct-16	713
MOG500000	Sand and Gravel Washing	31-May-15	67
MOG640000	Water Treatment Plants	31-Oct-18	129
MOG641000	Water Softeners	31-May-18	15
MOG670000	Hydrostatic Testing	04-Oct-17	6
MOG690000	Dredging - Lakes and Harbors	13-Mar-18	14
MOG698000	Aggregate Dredging	13-Mar-18	8
MOG750000	Car Washes	31-Jul-18	20
MOG760000	Swimming Pools	31-Jul-19	93
MOG821000	Land Application Septage	04-Oct-17	109
MOG822000	Land Application - Food Waste	16-Jun-16	94
MOG823000	Domestic No Discharge	26-Apr-17	56
MOG840000	Clay Mining	30-Jun-21	71
MOG870000	Pesticide	30-Oct-16	7
MOG920000	Feedstock Composting	29-Nov-17	4
MOG940000	Fuel Spill Cleanup	11-Nov-15	4
MOG970000	Yard Waste Composting	29-Nov-17	28
MOGD00000	Non-POTW Discharging < 50,000gpd	30-Jun-19	176
MOR040000	Small MS4	12-Jun-13	77

NPDES Electronic Reporting Rule Phase 2 Implementation Plan
Missouri Department of Natural Resources

Date

MOR100000	Land Disturbance by City or County	30-May-17	38
MOR130000	Textile and Apparel/ Printing and Publ.	29-May-18	112
MOR203000	Metal Fabrication	31-Aug-19	256
MOR22A000	Primary Wood and Lumber	31-Aug-19	113
MOR22B000	Wood Preserving/Treating	31-Aug-20	8
MOR22C000	Secondary Wood and Lumber	31-Oct-18	59
MOR23A000	Chemical Manufacturing	31-Oct-20	49
MOR23D000	Plastics and Rubber Manufacturing	03-Feb-16	88
MOR23E000	Biodiesel Manufacturing	31-May-18	10
MOR240000	Agrichemical Facilities	30-Apr-19	477
MOR60A000	Motor Vehicle Salvage	31-Oct-18	246
MOR60C000	Waste Tire Storage and Recycling	15-Oct-97	1
MOR80C000	Motor Freight Transportation	04-Oct-17	261
MOR80F000	Airports	04-Oct-17	32
MOR80H000	Solid Waste Transfer Station	31-Aug-19	65
MORA00000	Land Disturbance	07-Feb-17	4892
Total of NPDES GPCFs			8690

C. Number of Active and Administratively Continued State-Only General Permit Covered Facilities as of 26 October 2016:

MGP #	MGP Title	Expiration	GPCF #s
MOGC00000	Sewer Extension Construction	19-Apr-20	155
MOGS10000	state non-NPDES permit	27-Jan-18	458
Total of State-Only GPCFs			613

3. Current and/or Planned NPDES Data Systems and E-reporting Tools

Missouri is a geographically diverse state with wide variations in population growth, economic prosperity, and heritage. For example, the southwest portion of our state continues to grow in terms of population; however, most of northern Missouri continues to see declining populations. This will impact the availability of broadband services to remain profitable in some areas of the state. In addition, due to local geography, there are still areas of the state which do not have broadband service.

Missouri has struggled for several years with inaccurate data in ICIS-NPDES and therefore in ECHO. This has been a significant concern for our permittees. Recently, USEPA has been working with us to address this issue.

The department initiated a web-based automated system in 2013 called eDMR by which NPDES permitted facilities electronically submit DMRs and associated information in compliance with permit conditions. The eDMR system helps streamline the management of

NPDES Electronic Reporting Rule Phase 2 Implementation Plan

Missouri Department of Natural Resources

Date

DMRs by allowing the department to electronically acknowledge receipt, validate data, and upload the information to the department's main water database, Missouri Clean Water Information System (MoCWIS), which then batches information to USEPA's ICIS database.

Current Electronic Systems:

- A. ePermitting – currently only an application for stormwater construction/land disturbance permits. This system incorporates state laws, terms and conditions, allows for online payment of fees and interacts with our geodatabase and water quality standards application to determine receiving streams and classified water bodies. The department has made use of ePermitting mandatory, but allow exemptions for select reasons (e.g., religion). Over 99% of stormwater construction/land disturbance permits are issued through ePermitting.
- B. eDMR – Customized off the shelf (COTS) solution (Enfotech's E2) that allows electronic submittal of DMRs. The use of eDMR had been voluntary until recently. Current facilities required to participate include those general permit covered facilities where the master general permit requires it (i.e., namely those master general permits with renewals initiated after 21 December 2015), majors, and facilities renewing their applications as of 1 October 2016. As of 24 October 2016, a total of 1,059 facilities are participating in eDMR out of a total of 5,180 facilities required to provide DMRs.
- C. Missouri Clean Water Information System (MoCWIS) – Missouri's database for NPDES applications, permitting, compliance, and enforcement. While mostly an internal database used by permit writers, there is a public interface that displays limited information. It also manages the same data for state-only permits and pre-application projects (antidegradation). MoCWIS interfaces with our fees system, eDMR, ePermitting, and water quality standards system.
- D. ICIS-NPDES Batches: Missouri currently submits some clean water permit, compliance and enforcement data electronically to the USEPA. This data is provided via an automated batch process between the department's data system and USEPA's data system. Implementation of this batch process occurred in two different projects.
 - a. Batch 1 – Missouri uses one batch submission to submit most permit (facility through DMR) data to ICIS. This is a weekly batch submission to ICIS-NPDES. Batch 1 has been in production since 2011. Currently the department is working with USEPA to investigate inconsistencies and data transmission errors.
 - b. Batch 2/3 – Missouri is developing a separate batch process to submit permit program report, inspection, and enforcement data to ICIS-NPDES. Batch 2/3 went into production September 2015.

Planned Projects

- E. MoCWIS Permitted Feature Mapping:
 - a. This is an internal enhancement to MoCWIS. It is likened to the department's currently available capabilities found in of our ePermitting system. This feature will allow a higher accuracy of interaction between MoCWIS, our geographic information system and our Water Quality Application database. The feature currently applies to only the permit writer side of MoCWIS, enabling permit writers

NPDES Electronic Reporting Rule Phase 2 Implementation Plan
Missouri Department of Natural Resources

Date

to identify an outfall point on the map, trace the point to the receiving stream, first downstream classified water body, and gather other watershed based information. The functionality will eventually be used to expand the ePermitting system to other general permits. This project started in May 2015 and is planned for completion in December 2016.

- b. Note: The functionality to be developed in MoCWIS Permitted Feature Mapping must be complete for expansion of our ePermitting system and full implementation of an eApplication System.

F. CROMERR:

- a. The department plans to use Shared CROMERR Services to build a department-wide CROMERR-Compliant portal or gateway that will interface with numerous department applications that allow electronic reporting. The department is in the early planning stages of this project, which has been significantly delayed due to lack of available staff resources. The department has received Exchange Network grant funds for this project and hopes to be completed with the CROMERR-Compliant Portal by September 2017.
- b. Note: CROMERR project completion is required before full implementation of later projects can be done.

Projects that do not have an estimated start or end date at this time:

G. eDMR Enhancements:

- a. Modify eDMR to link with a department-wide CROMERR portal/gateway and use shared CROMERR services as appropriate.
- b. Fix numerous issues with our current eDMR system that is causing significant errors when data is transferred between eDMR and MoCWIS. The department is working with our consolidated IT staff and Enfotech to develop a new maintenance agreement to fix systemic issues.

H. ePermitting Enhancements:

- a. Cannot start until MoCWIS Permitted Feature Mapping is complete.
- b. Modify to link with a department-wide CROMERR portal/gateway and use CROMERR shared services as appropriate.
- c. Expand the functionality of the system to allow applicants to request permit terminations, renewals, modifications and other permitting actions such as no exposure certification requests and waivers.
- d. Allow acceptance of more applications and permit issuances, beyond just storm water construction permits (see eApplication development below).

I. eApplication system analysis, design, and development:

- a. Cannot start until MoCWIS Permitted Feature Mapping is complete.
- b. A new system for eApplications will be needed for site-specific (individual) permits, and any permits that require staff review or interaction before being automatically issued.
 - i. This is to include General Permit Reports, including:
 - 1. Notices of Intent/Applications,

NPDES Electronic Reporting Rule Phase 2 Implementation Plan
Missouri Department of Natural Resources

Date

2. Notices of Termination requests,
 3. No Exposure Certification requests,
 4. Low Erosivity Waiver requests, and
 5. Any other waivers, as needed.
- c. This system will use the CROMERR portal/gateway and shared CROMERR services as appropriate.
 - d. Missouri applied for and was awarded an Exchange Network grant that began 1 October 2016, to expand our eApplication and help the department meet Phase 2 requirements of the eReporting Rule.
- J. eReporting for Programmatic Reports
- a. Staff are exploring options for compliance with this requirement, including:
 - i. Developing our own electronic forms with Missouri's consolidated IT staff,
 - ii. Pursuing shared services offered through USEPA's NeT system, and/or
 - iii. Expanding contract services with Enfotech.
 - b. Allow for online submittal of certain reports.
 - i. Concentrated Animal Feeding Operation annual program reports,
 - ii. Municipal Separate Storm Sewer System program reports,
 - iii. POTW pretreatment program annual reports,
 - iv. Significant Industrial User Compliance Reports in municipalities without approved pretreatment programs,
 - v. Sewer Overflow Event Reports, and
 - vi. CWA Section 316(b) annual reports.
 - c. Use department-wide CROMERR portal/gateway and use CROMERR shared services.
- K. MoCWIS Enhancements
- a. This project will occur in conjunction with or directly after projects outlined above.
 - b. MoCWIS needs to be enhanced to incorporate new data elements that are being captured from eDMR, ePermitting, eApplication, and eReporting for Program Reports.
 - c. MoCWIS will also need to be enhanced to capture additional data required in Appendix A of the rule if it is not captured today.
- L. ICIS Batch Enhancements
- a. ICIS Batch 1 and 2/3 Enhancements must be done in conjunction with MoCWIS Enhancements.
 - b. ICIS Batch 1 will be enhanced to capture new fields required in Appendix A and captured in MoCWIS, eDMR, ePermitting and eApplication.
 - c. ICIS Batch 2/3 will be enhanced to allow submission of new data elements listed in Appendix A related to program reports, inspection or enforcement.
 - d. In Missouri, the two ICIS batch processes were developed separately and use different code which is why they are broken out into two projects.

4. Key Tasks for Updating Agency Data Systems and Data Transmission Systems for Phase 2 Data Groups

NPDES Electronic Reporting Rule Phase 2 Implementation Plan
Missouri Department of Natural Resources

Date

In this section, if you have a current system, describe key tasks for updating the agency NPDES data systems to manage and share the data in each of the Phase 2 Data Groups with EPA's ICIS-NPDES (e.g., adding new data elements to state NPDES data systems, updating the state's electronic data transmission capabilities, including incorporating new data schemas and Environmental Information Exchange Network node plug-ins). If you do not have a current system, describe your development and/or purchasing process and timelines. If multiple state agencies administer these programs, this can be a combined plan or each agency may submit a plan. Please indicate if you plan to use the EPA NeT system for any of these items. Timelines will then be as NeT becomes available. For either scenario, describe the roles and responsibilities for agency staff, contractors (if needed), and EPA (if needed). Include estimated completion timelines for each of the key tasks for each data group in this section. Clearly state if data system updates will cover more than one data group (data group subsections may be combined as needed). Indicate if your plan is to direct enter data into ICIS rather than electronically flow data. As an example, data groups have been listed below. Your agency may have different names for these groups. These are for example purposes only. The following table summarizes the major milestones for each NPDES Data Group.

NPDES Data Group	Milestones	Target Date

A. General Permit Reports - Including NOIs, NOTs, NOEs, and LEWs; see 40 CFR 122.26(b)(15), 122.28, and 124.5

Agency/Contractor/EPA Roles and Responsibilities:
Task Completion Timeline:

B. Concentrated Animal Feeding Operation (CAFO) Annual Program Reports - See 40 CFR 122.42(e)(4)

Agency/Contractor/EPA Roles and Responsibilities:
Task Completion Timeline:

C. Municipal Separate Storm Sewer System (MS4) Program Reports - See 40 CFR 122.34(g)(3) and 122.42(e)

Agency/Contractor/EPA Roles and Responsibilities:
Task Completion Timeline:

D. Pretreatment Program Reports - See 40 CFR 403.12(i)

Agency/Contractor/EPA Roles and Responsibilities:
Task Completion Timeline:

E. Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs - See 40 CFR 403.12(e) and (h)

Agency/Contractor/EPA Roles and Responsibilities:
Task Completion Timeline:

NPDES Electronic Reporting Rule Phase 2 Implementation Plan
Missouri Department of Natural Resources

Date

E. Sewer Overflow/Bypass Event Reports - See 40 CFR 122.41(l)(4), (l)(6) and (7), and (m)(3)

Agency/Contractor/EPA Roles and Responsibilities:

Task Completion Timeline:

G. CWA section 316(b) Annual Reports - See 40 CFR 125, subpart J

Agency/Contractor/EPA Roles and Responsibilities:

Task Completion Timeline:

H. Sewage Sludge/Biosolids Annual Program Reports - Complete this subsection only if the agency is the authorized NPDES program for biosolids; see 40 CFR 503

Agency/Contractor/EPA Roles and Responsibilities:

Task Completion Timeline:

5. CROMERR Compliance Status for Agency Electronic Reporting Systems

Missouri's eDMR system is not CROMERR approved at this time, however, our current paper application process has been approved by the department's General Counsel with consultation from USEPA Region 7.

Missouri is currently building a department-wide CROMERR Compliant portal or gateway using USEPA shared services that will interface with numerous existing systems at the time of its completion in Fall 2017. These existing systems include SSO Bypass Portal, ePermitting, and eDMR.

Those systems developed after Fall 2017, such as eApplication and the programmatic report system, will be compliant as of their system launch.

Federally required sewage sludge/biosolids annual program reports under Section 503 are to be submitted to USEPA through NetDMR.

**6. State Statutes, State Regulation/Administrative Rule, and NPDES Permit Update
Estimated Completion Dates**

At this time, it does not appear that Missouri statute or regulation changes will be required to implement eReporting. The department is in the process of voluntarily amending 10 CSR 20-6.010 to include electronic reporting provisions for additional clarity. Our permittees, stakeholders, and the State Legislature may determine at any time that supplementary changes are needed. All parties need to be aware of that possibility. Given the timelines required by Missouri Statute in order to promulgate regulations, any state regulation changes will take a minimum of 18 months.

Once the appropriate IT tools are in place (i.e., the tools are available for electronic reporting), the department will insert requirements into Permit Conditions as permits are renewed. Permit writers began adding eReporting into permit conditions as of December 2015 and will continue

NPDES Electronic Reporting Rule Phase 2 Implementation Plan
Missouri Department of Natural Resources

Date

to add conditions as permits are renewed. Permits are issued for 5 years and it is not feasible given our workload to modify permits to add conditions related to NPDES eReporting outside of renewal, except for those facilities categorized as majors. All major facility permits are currently undergoing a minor modification to add the eReporting condition regardless of permit renewal date.

7. Temporary and Permanent Waiver Approval Process (127.24c)

Regional office directors and central office section chiefs are authorized to approve waiver requests in accordance with the following procedures.

Per 40 CFR 127.15 and 127.24, permitted facilities may request a temporary waiver for up to 5 years or a permanent waiver from electronic reporting from the department. Each request must be signed by an authorized representative and contain the facility name; permit number; facility address; name, address, and contact information for the owner, operator, or appointed representative; and a brief written statement explaining the need for the waiver. An eDMR Waiver Request Form has been developed to outline the required information (<http://dnr.mo.gov/forms/780-2692-f.pdf>). A request must be made for each facility. If more than one facility is owned or operated by a single entity, then the entity must submit a separate request for each facility based on its specific circumstances. An approved waiver is non-transferable.

The department must review and notify the facility within 120 days of receipt if the waiver request has been approved or rejected [40 CFR 124.27(a)]. Federal regulations have no reference to a time extension. During the department review period as well as after a waiver is granted, the facility must continue submitting a hard-copy of any reports required by their permit. The department will enter data submitted in hard-copy from those facilities allowed to do so and electronically submit the data to the USEPA on behalf of the facility.

Staff should file eDMR waiver requests and the associated departmental approval or denial with the permit record under the facility folder on the T drive. At this time, addition of such documents into the Electronic Content Management (ECM) system should not occur. Currently Central Office staff are working with Information Technology staff to implement a program-wide project related to adding final permitting documents into ECM. The only documents to be added into ECM as this time are the MO-RA permits, MO-RA wet ink signature pages, and eDMR application packets. Additional guidance will be given in the future once that project is complete.

Temporary Waivers

The department may not grant a temporary waiver in excess of 5 years, but a facility may reapply to extend the waiver. Temporary waivers should follow the duration of the permit term if less than 5 years remains and may not be administratively continued should the permit expire before a renewal is processed. If the issuance of a master general permit template or site specific permit is imminent and before the 120-day decision deadline, the permit writer may hold the waiver request until permit issuance. However if the GPCF or site specific permit cannot be issued before the 120-day deadline, a decision regarding the waiver must be sent to the facility prior to the 120-day deadline being reached.

NPDES Electronic Reporting Rule Phase 2 Implementation Plan
Missouri Department of Natural Resources

Date

In this later scenario, the duration of a temporary waiver approved prior to the issuance of a permit renewal would not coincide with the permit expiration. The permit writer has discretion to determine an appropriate expiration date of the temporary waiver up to the maximum of 5 years from the date of waiver approval. See the examples below.

- If the eDMR requirement is a condition of a current permit and the permit is effective, staff could grant the waiver for up to the expiration of the current permit.
- If the eDMR requirement is a condition of the current permit and the permit is expired, staff could grant a short term waiver (e.g., 1 year) to provide 'gap coverage' for the time period between waiver expiration and permit issuance. An additional waiver may be granted at permit issuance.
- If the eDMR requirement is not a condition of the current permit and the permit is effective, then staff should be granting a short term waiver (e.g., 1 year or the remainder of the current permit term). This period could vary depending on the time table for permit renewal.
- If the eDMR requirement is not a condition of the current permit and the permit is expired, we could issue a short term waiver then direct the applicant to request another waiver at permit renewal, which could then be for a longer term up to 5 years.

At each permit renewal, the facility must either submit an eDMR participation packet or a new waiver request with the permit application.

Temporary waivers may be granted to facilities that fall into one of the following categories:

1. Located in areas with limited broadband access. The National Telecommunications and Information Administration (NTIA) in collaboration with the Federal Communications Commission (FCC) have created a broadband internet availability map: <http://www.broadbandmap.gov/>;
2. Commit to terminating their permit within 1 year;
3. Use of a computer application to facilitate electronic reporting has yet to be developed by the department; or
4. On a case-by-case basis provided sufficient justification documented by the issuing office.

Permanent Waivers

Permanent waivers from electronic reporting may only be requested by facilities owned or operated by members of religious communities that choose not to use certain modern technologies (e.g., computers, electricity). Permanent waivers do not have an expiration date, but must be reviewed and possibly revoked should the facility change ownership.

Episodic Waivers

The department may also issue an episodic waiver for up to 60 days in the case of large scale emergencies or electronic reporting system outages longer than 96 hours allowing facilities to submit hard-copy reports or delay electronic submission for up to 40 days. Large scale emergencies include catastrophic circumstances beyond the control of the facilities, such as floods, tornados, or other national disasters. No request is required from affected facilities. The

NPDES Electronic Reporting Rule Phase 2 Implementation Plan

Missouri Department of Natural Resources

Date

department must provide an individual or mass notice defining when the waiver is available, who may use it, the duration of the waiver, and how to submit required data.

8. Outreach and Training

The department has and will continue to present eReporting Rule information, requirements and timelines to the regulated community, general public and interested stakeholders at statewide meetings, trade shows, conferences, clean water forums as well as utilize trade publications and brochures. Regional Office staff is actively reaching out to permittees to aid in the registration and use of the eDMR system through compliance assistance visits and inspections.

The department is using in-person training workshops to provide hands-on training for operators. This is sometimes necessary as some operators do not have strong computer skills. These workshops were monthly and now occur twice a month. More sessions, including ones held in the far reaches of the state, will take place in the future. Regional office staff is providing one-on-one training as well as group training for those not able to travel to the central office. The department is integrating their eDMR training into existing waste water treatment plant operator training sessions. The department also has an eDMR manual posted online and is contemplating recording one training session to post online for future use by those not able to attend a scheduled session.

The department is systematically notifying permittees of eDMR requirements through letters. A small team of staff are dedicated to responding to technical questions about the eDMR system. DMR data entry staff is helping facilities with many data entry questions as well. Permit writers are answering questions related to eDMR applications and helping to educate operators on permit requirements related to electronic reporting.

9. Alternative Options

The department's primary plan will be to utilize a commercial off-the-shelf system that would use the same portal as the current eDMR system. The backup plan includes investigating the applicability of and use of USEPA's NeT eservices if the state can remain the initial recipient of the data and submit to USEPA via the current batch method. Additional options include building our own system by contracting the consolidated state IT staff or an additional component added to Enfotech's current E2 system that would service as a submission system for programmatic reports.

10. Obstacles to Rule Implementation

The Water Protection Program is just one piece of a large and complex agency with a full time equivalent of over 1,300. The department has a limited amount of funding and staff resources available to dedicate to IT in any given year as well as having a consolidated IT staff for all state agencies. The fiscal resources must be distributed across the entire department or even the state and there are many competing priorities for those IT funds. However, Water Protection Program staff will continue to emphasize the requirements of the rule as well as the need to complete IT and other related projects as quickly as possible while not compromising project quality or environmental and public health.

NPDES Electronic Reporting Rule Phase 2 Implementation Plan Missouri Department of Natural Resources

Date

Compliance with all phases and components of the eReporting Rule will require significant staff time in order to complete. It is important to note that department has already refocused permitting staff work related to other recently amended regulations such as the 316(b) and Coal Combustion Residual, the pending NPDES Updates and MS4 Remand. Our staff will be required to shift their focus from their primary duty – protecting human health and the environment – in addition to working with ongoing staff shortages and turnover. As needed, permit staff will dedicate the time needed to address eReporting requirements, but other duties, such as working on permit backlog, will not progress as quickly as desired.

11. Implementation Plan Reassessment

The department and USEPA Region 7 reinstated quarterly NPDES coordination calls/meetings that will continue through the completion of this and other applicable rules. Department staff will update USEPA on the process toward the goals of the Implementation Plan and notify them if the anticipated timelines provided in this document will be delayed by more than 3 months during those quarterly calls/meetings. The implementation plan document will be amended once a year in December, should any changes have occurred in the past or are anticipated in the future. If no changes are necessary, then the document will remain unedited. A full assessment of the department's progress will occur by December 2019 to ensure the department is on target for a December 2020 implementation as required by the rule or any alternative dates as previously established with USEPA.

Definitions/Acronyms

CAFO	Concentrated Animal Feeding Operation
DMR	Discharge Monitoring Report
MoCWIS	Missouri Clean Water Information System
MS4	Municipal Separate Stormwater Sewer System
NPDES	National Pollutant Discharge Elimination System
POTW	Publicly Owned Treatment Works
USEPA	U.S. Environmental Protection Agency