

National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule

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Water Protection Forum

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Overview

- Federal NPDES Electronic Permitting Rule
 - Phase 1: Discharge Monitoring Reports
 - Phase 2 Implementation Plan
 - Phase 2: Applications, Programmatic Reports



NPDES Electronic Reporting Rule (eReporting)

- Published 22 October 2015.
- Effective 21 December 2015.
 - 80 FR 64063
 - 40 CFR Part 127
 - Also impacts Parts 122, 123, 124, 403, 501, & 503.



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Part II

Environmental Protection Agency

40 CFR Parts 9, 122, 123, *et al.*
National Pollutant Discharge Elimination System (NPDES) Electronic
Reporting Rule; Final Rule

eReporting Rule

- Requires electronic submission of information instead of paper submissions.
- Requires states to share data electronically with USEPA.
 - Data state receives from regulated entities,
 - Compliance monitoring (e.g., inspections),
 - Violation determinations, and
 - Enforcement actions.

eReporting Rule

- Why?
 - Increase data accuracy.
 - Save resources (paper, file space, etc.).
 - Improve and more timely compliance.
 - Enhance transparency.
 - Strategically address serious issues with limited resources.
- Who?
 - All permittees, generally.

eReporting Rule

- Waivers (allowed to submit paper DMRs):
 - Non-transferable
 - Permittee Requested:
 - Temporary, renewable, max 5 years
 - Lack of internet access.
 - Termination of permit in less than 1 year.
 - Computer application has not yet been developed.
 - Other with justification.
 - Permanent (e.g., religious reasons)
 - DNR issued:
 - Episodic (e.g., short term, natural disasters)

eReporting – Phase 1

- Requirements begin 21 December 2016.
- Electronic Discharge Monitoring Reports (eDMRs)
- Biosolids/Sewage Sludge (§503) Reports to USEPA.
- Inspection, violation, & enforcement data.
- Phase 2 State Implementation Plan



eReporting – Phase 1 – eDMR

- eDMR system introduced in 2013.
 - Web-based system electronically
 - validates data entered and reports uploaded by authorized individuals directly into system,
 - acknowledges receipt, and
 - uploads data to Missouri’s Clean Water Information System (MoCWIS) database.
 - Must submit paper authorization to participate.
 - When CROMEER compliant, can apply online.

eReporting – Phase 1 – eDMR

- eDMR
 - General Permits
 - As renew Master General Permit templates requiring use of eDMR.
 - Site specific permits
 - Majors – submit applications by 21 December 2016.
 - For others – voluntary currently. Mandatory when permit renewed after 21 December 2016.
 - New application forms as of October 2016.
 - Minor permit modification, no fee.

eReporting – Phase 1 – eDMR

- eDMR
 - Currently ~21% participation (10/24/2016).
 - 1,059 facilities out of 5,180 facilities.
 - Training offered in Jefferson City.
 - 2017 – Training in or near Regional Offices
 - Email questions to edmr@dnr.mo.gov
 - <http://dnr.mo.gov/env/wpp/edmr.htm>

eReporting – Phase 1 – Biosolids

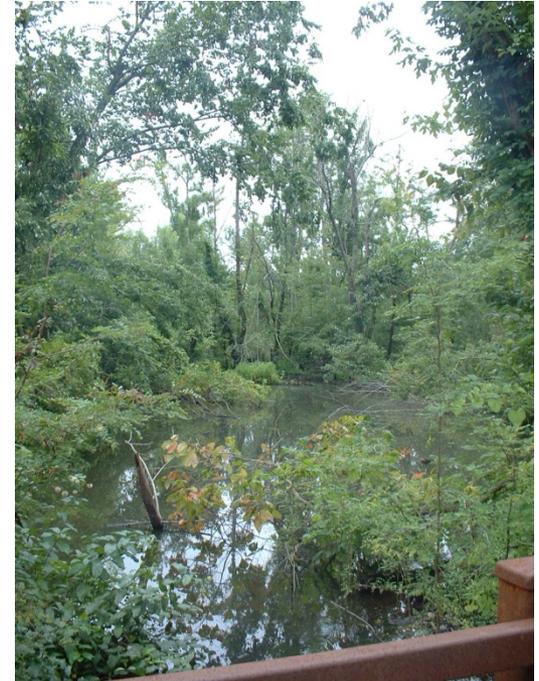
- Biosolids/Sewage Sludge (§503) Reports.
 - USEPA initial recipient of §503 reports:
 - Class I sludge management facilities,
 - POTWs with design flow \geq 1 million GPD, and
 - POTWs serving 10,000 people or more.
 - EPA’s NeT ready for use 21 December 2016
 - Reports due 21 February 2017.
 - Accessed through CDX: <https://cdx.epa.gov/>
 - MoDNR Standard Condition Part III:
 - Sludge Report, Form S, due 28 January 2017.
 - eDMR attachment.

eReporting – Phase 2 Plan

- State Implementation Plan
 - Tasks, goals, timelines, and resources needed.
 - Staff currently drafting.
 - NPDES universe,
 - Current and planned electronic systems,
 - Gap analysis for Phase 2 data groups (Appendix A),
 - Statute and/or regulatory changes needed,
 - Waiver approval process,
 - Outreach and Training,
 - Alternatives, Obstacles, and reassessment.
 - Due to USEPA 21 December 2016.
 - Provide comments by COB 30 November 2016.

eReporting – Phase 2

- Requirements begin 21 December 2020.
 - General permit processes:
 - Notices of Intent/Applications,
 - Notice of Termination,
 - No Exposure Certification, and
 - Low Erosivity Waiver.
 - Programmatic reports:
 - CAFO annual report,
 - MS4 reports,
 - pretreatment annual reports,
 - sewer overflow/bypass reports, and
 - Section 316(b) annual reports.



eReporting – Phase 2 cont.

- Significant database and system needs:
 - MoCWIS enhancements,
 - Appendix A data & new data from projects below.
 - ePermitting/eApplication,
 - Link to CROMEER portal & more functionality.
 - eDMR enhancements, and
 - Link to CROMEER portal & fix data transfer errors.
 - Programmatic reports (data entry vs attachment).
 - ICIS batch enhancements.
 - Capture new fields/data.

Additional IT projects

- Shared CROMEER services
 - DNR compliant portal across numerous programs for electronic reporting.
- MoCWIS Permitted Feature Mapping
 - Similar to mapping in ePermitting.
 - Enable applicant to identify outfalls on map.
- Electronic Content Management (ECM)
 - Online filing system.
 - Upgrade to include public portal.

Timeline Summary

- 2016
 - December: eReporting Phase 1
 - eDMRs
 - Majors
 - Voluntary turns mandatory when submit application
 - Implementation Plan
- 2016-2020
 - eDMR compliance through permit renewals
 - ECM upgrades

Timeline Summary

- SFY 2018
 - CROMEER compliance
- 2020
 - December: eReporting Phase 2
 - eApplication
 - Programmatic Reports
 - Appendix A data



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Questions?

