

# NPDES Electronic Reporting Rule Phase 2 Implementation Plan

## Arizona Department of Environmental Quality December 21, 2016

### Implementation Plan Purpose

On October 22, 2015, EPA published the final National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule. 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 Electronic Reporting 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. EPA does not dictate the electronic reporting tools that a state may use. Rather, EPA 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 EPA. A state, tribe, or territory that is designated by EPA as the initial recipient for an NPDES data group must submit an implementation plan to EPA 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 the final rule [40 CFR 127.26(h)], authorized NPDES programs must submit an Implementation Plan (IP) to EPA by December 21, 2016, for EPA's review. EPA 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](mailto:NPDESElectronicReporting@epa.gov).

### 1. Overview/Executive Summary

*In this section, give a brief overview of the agency's current data systems and e-reporting capabilities. (Details will be provided elsewhere in this template.) Summarize the key tasks for updating or building the agency's data systems and include estimated timelines. (i.e., Indicate what data you will act as initial recipient, brief description of current or planned eReporting tools, title of executive sponsors and main personnel involved with implementation, current or planned databases and data transfer to EPA capabilities.) This section should provide the primary contact for this IP and the approximate date when the agency expects to successfully implement electronic reporting for Phase 2 data.*

The Arizona Department of Environmental Quality (ADEQ) has developed a web-based tool to facilitate electronic reporting of data called myDEQ. The following modules are currently available on myDEQ:

- E-reporting of self-monitoring report forms (SMRFs) and discharge monitoring reports (DMRs) for the Aquifer Protection Permit Program and Arizona Pollutant Discharge Elimination System (AZPDES) Individual Permit Program;
- Obtain and modify EPA ID for hazardous waste generation;
- Obtain crushing and screening, concrete batch plant, hot mix asphalt batch plant Air Quality General Permits; and
- Quick Pay to pay bills on line.

ADEQ is currently in process of bring new modules on line and the next build slated for production is the AZPDES stormwater and general permit module to allow permittees the ability to apply for a notice of intent

to discharge and submit discharge monitoring reports on line. ADEQ will continue to develop modules to meet the Phase 2 reporting deadlines.

## 2. Agency NPDES Universe

*This section is a “snapshot” in time and should include a date of when these numbers were calculated. Provide the names of your NPDES individual and master general permits (MGP) and counts of general permit authorizations for each MGP currently under the jurisdiction of your agency. Please also indicate the number of permits that are currently not in EPA’s ICIS-NPDES database. Please mention anticipated large changes in these numbers (new or terminating MGPs). If you wish, electronic reporting counts or percentages may also be included in this section. The following list is for example purposes only and you should group your permits as you wish.*

As of November 2016, ADEQ has the following number of permittees:

- A. 58 Active and Administratively Continued Major Individual AZPDES Permits:
- B. 76 Active and Administratively Continued Minor Individual AZPDES Permits:
- C. 56 Active and Administratively Continued MS4 Permits:
- D. List of Agency General NPDES Permits with number of authorizations for each:
  - a. Multi-sector General Permit – 1,168
  - b. Construction General Permit – 3,541
  - c. Diminimus General Permit - 105
  - d. General Permit WW – 6
  - e. General Permit Pesticide Applicator – 20
  - f. MS4 Permits -
- E. Biosolid Universe – ~50
- F. Pretreatment Approvals – 19
- G. Significant Industrial Users- 130

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

*In this section, detail the current NPDES data systems and/or e-reporting tools that your agency currently employs, or your planned e-reporting systems/tools. States that elect to use EPA’s electronic reporting tools can cite that in this section.*

ADEQ uses the myDEQ application to collect electronic data from AZPDES permittees. The information flows from the myDEQ application and is housed in ADEQ’s Azurite database. This information is transmitted to the EPA’s ICIS database using a node. The following is a list of the current and planned E-reporting tools.

- Modules to facilitate electronic permits for AZPDES Major/Minors and the Wastewater General Permit.
- Module for submittal of NOIs for their MSGP, DMGP, and CGP permits is in progress and is expected to be completed by the end of FY17.
- Module for submittal of DMRs for MSGP, DMGP, and CGP permits is in progress and expected to be completed by the end of FY17.

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

*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.

<i>NPDES Data Group</i>	<i>Milestones</i>	<i>Target Completion Date</i>
<i>DG-1 Core Data</i>	<i>Major/Minor Data</i>	<i>Completed</i>
	<i>MSGP/CGP/DMGP Data</i>	<i>In – Progress - December 2017</i>
	<i>Biosolids</i>	<i>In-Progress</i>
	<i>MS4</i>	<i>In-progress</i>
	<i>Pretreatment</i>	<i>In-progress</i>
	<i>CAFO</i>	<i>Complete</i>
	<i>SEV</i>	<i>In-progress</i>
<i>DG-2 General Permit Reports (NOIs , NOTs, No exposure certs, MS4 NOIs)</i>	<i>MSGP/CGP/DMGP (NOI, NOT, No exposure waiver)</i>	<i>July 2017</i>
<i>DG-2 General Permit Reports (NOI, NOTs, No exporsure cert, MS4 NOIs</i>	<i>Discovery</i>	<i>December 2017</i>
	<i>Azurite Build</i>	<i>December 2018</i>
	<i>myDEQ Build</i>	<i>December 2018</i>
	<i>Node Updates</i>	<i>December 2018</i>
<i>DG-3 DMRs</i>	<i>Complete GP Build</i>	<i>See Above (DG-2)</i>
	<i>Flowing GP DMRs</i>	<i>See Above (DG-2)</i>
<i>DG-4 Sewage Sludge/Biosolids (Because AZ has primacy over the biosolids program – these requirements are in phase 2 of the rule)</i>	<i>Discovery</i>	<i>December 2017</i>
	<i>Azurite Build</i>	<i>December 2018</i>
	<i>myDEQ Build</i>	<i>December 2018</i>
	<i>Node Updates</i>	<i>December 2018</i>
<i>DG-5 CAFOs</i>	<i>Discovery</i>	<i>December 2017</i>
<i>DG-6 MS4s</i>	<i>Discovery</i>	<i>December 2017</i>
	<i>Azurite Updates</i>	<i>December 2019</i>
	<i>myDEQ Build</i>	<i>December 2019</i>
	<i>Node Updates</i>	<i>December 2019</i>
<i>DG-7 Pretreatment</i>	<i>Discovery</i>	<i>December 2017</i>
	<i>Azurite Updates</i>	<i>December 2019</i>
	<i>myDEQ Build</i>	<i>December 2019</i>
	<i>Node Updates</i>	<i>December 2019</i>
<i>DG-8 SIUs</i>	<i>Discovery</i>	<i>December 2017</i>
	<i>Azurite Build</i>	<i>December 2019</i>
	<i>myDEQ Build</i>	<i>December 2019</i>
	<i>Node Updates</i>	<i>December 2019</i>
<i>DG-9 SSOs</i>	<i>Discovery</i>	<i>December 2017</i>
	<i>Azurite Build</i>	<i>December 2018</i>
	<i>myDEQ Build</i>	<i>December 2018</i>
	<i>Node Updates</i>	<i>December 2018</i>

DG-10 CWA Annual Reports (Cooling Water Intake Structures)	No permitted CWIS in Arizona	NA
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**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: ADEQ/In-house development/Chris Henninger  
Task Completion Timeline: December 2017

**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: ADEQ has only 1 permitted AZPDES CAFO and will investigate the E-reporting requirements for this facility by December 2017.

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

Agency/Contractor/EPA Roles and Responsibilities: ADEQ/In-house development/Chris Henninger  
Task Completion Timeline: (See DG-6 in table above)

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

Agency/Contractor/EPA Roles and Responsibilities: ADEQ/In-house development/Andy Koester  
Task Completion Timeline: (See DG-7 in table above)

**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: ADEQ/In-house development/Andy Koester  
Task Completion Timeline: (See DG-8 in table above)

**F. 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: ADEQ/In-house development/Andy Koester  
Task Completion Timeline: (See DG-9 in table above)

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

Agency/Contractor/EPA Roles and Responsibilities: NA – ADEQ does not regulate any facilities that have an active cooling water intake structure.  
Task Completion Timeline: NA

**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: ADEQ/In-house development/Andy Koester  
Task Completion Timeline: (See DG-9 in table above)

**5. CROMERR Compliance Status for Agency Electronic Reporting Systems**

ADEQ has an approved CROMERR application for all NPDES data groups. The application was approved on June 7, 2016

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

ADEQ believes they have sufficient authority under current rules to enforce electronic reporting. ADEQ has already changed permit boilerplate language to require electronic reporting for all applicable permits.

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

A. Temporary Waiver Process –

ADEQ has completed their process to grant temporary waivers to electronic reporting.

B. Permanent Waiver Process –

ADEQ has not encountered the situation where a permanent waiver is deemed appropriate. If necessary, ADEQ would modify the procedure used to grant the temporary waiver.

## **8. Outreach and Training**

*In this section, summarize the outreach and training necessary to alert and educate NPDES regulated entities on how to utilize the agency's planned electronic reporting systems. Please include past, present and future information.*

ADEQ has used multiple outreach techniques to get permittees on board with the electronic reporting rule requirements. The type of outreach includes:

- Gov-Delivery – e-mail list serve notifications
- Training at operator certification seminars and conferences
- Flyers provided during inspections and other events
- Telephoning and one-on-one communications with the regulated universe (considering out-sourcing for larger universe)
- On-boarding events encouraging sign up to myDEQ
- ADEQ website information
- Involve regulated community in application development and user testing

## **9. Alternative Options**

*In this section, summarize alternative options for converting to electronic reporting (e.g., utilization of EPA services and systems like NetDMR, NeT, or buying a Commercial Off-The-Shelf (COTS) system.) (This is a "Plan B" in case there are issues with implementing your "Plan A".)*

ADEQ has successfully built several modules of the myDEQ application for NPDES reporting. ADEQ will update this plan with an alternate option should it become necessary in the future.

## **10. Obstacles to Rule Implementation**

*In this section, describe any potential obstacles to e-reporting your agency anticipates, and discuss plans for overcoming these obstacles*

ADEQ has identified the following obstacles:

- Funding to complete the development of the necessary reporting
- Staffing and technical resources
- Cooperation from the regulated community to make changes in their reporting procedures
- Training
- Continuing changes to EPA's ICIS database make implementation a moving target

## **11. Implementation Plan Reassessment**

*In this section, identify the circumstances when the agency will contact EPA regarding a possible reassessment of this Implementation Plan. This cooperative discussion between EPA and the agency is intended to help evaluate all options for ensuring that the agency will be able to continue working towards complying with the E-Reporting Rule.*

ADEQ and EPA will continue to have monthly calls where the implementation is evaluated and discussed. ADEQ will update the plan as needed.