Alaska
Department of Environmental Conservation

NPDES eReporting Rule

Gap Analysis

Assessment Document

Final v1.0

December 8, 2016

WINDSOR SOLUTIONS | Environmental +
Health Information
Systems

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Contents

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Version Control

Version	Author	Date	Notes
0.5	Windsor	11/28/2016	Draft version for initial review.
1.0	Windsor	12/8/2016	Final version.

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Introduction

The Alaska Department of Environmental Conservation (ADEC) Division of Water (DOW) currently utilizes the Discharge Results and Online Permit System (DROPS), to manage surface water discharge permit and compliance information. Data from DROPS is used to update the US EPA Integrated Compliance Information System National Pollutant Discharge Elimination System (ICIS-NPDES). In the past, data has been entered manually into the ICIS-NPDES system. ADEC is currently engaged in a project to implement an automated flow of data from DROPS to the ICIS-NPDES system over the Exchange Network using the ADEC OpenNode2.

On October 22, 2015, the final National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule was published in the Federal Register. The purpose of this rule is to replace most paper-based Clean Water Act (CWA) NPDES permitting and compliance monitoring reporting requirements with electronic reporting. The NPDES Electronic Reporting (eReporting) Rule states that any compliance report submissions required from permitted facilities under the terms of their NPDES permit, along with general permit coverage applications, must be accepted electronically from regulated facilities and reported to the ICIS-NPDES system (electronically or otherwise).

Implementation of the eReporting Rule will require ADEC (and other agencies who are delegated for the NPDES program) to make changes to their information systems and business practices in order to meet the new reporting requirements, including support for additional data elements, provision of electronic reporting capabilities, and updated data submissions to the national ICIS-NPDES system.

ADEC has contracted with Windsor Solutions, Inc. (Windsor) to conduct an assessment of DROPS, other systems used by DOW, and DOW business processes, and to provide an assessment of the gaps between those systems and processes and the requirements of the eReporting Rule. Windsor will also provide a proposed implementation plan to include actions that will be required to bring ADEC into compliance with the eReporting Rule.

The purpose of this document is to present the results of the assessment that was conducted between September and November 2016. This document is organized as follows:

eReporting Rule Background	provides a summary of the purpose and implementation of the eReporting Rule.
Gap Analysis	details the findings from the assessment meetings.
Summary	provides a brief summary of the main conclusions from the assessment project and details next steps.

eReporting Rule Background

The objective of the eReporting Rule is to save time and resources for permitted sources, states, tribes, territories, and EPA while increasing data accuracy, improving compliance, and supporting EPA's goal of providing better protection of the nation's waters. The new regulation will help provide greater clarity on who is and who is not in compliance and will enhance transparency by providing a timelier, more complete, more accurate, and more nationally-consistent set of data about the NPDES program.

The eReporting Rule mandates electronic rather than paper-based reporting from regulated entities to the agency authorized to implement the NPDES program for the following permit and compliance monitoring information:

- Discharge Monitoring Reports (DMRs);
- Notices of Intent to discharge in compliance with a general permit; and
- Program reports.

Agencies authorized to implement the NPDES programs will also electronically submit program data to EPA to ensure that there is consistent and complete reporting nationwide, and to streamline the collection and processing of the data, thereby making it more accurate and timely.

The requirements of the eReporting Rule will be implemented over a five year period following the effective date of the final rule. The transition from paper to electronic reporting will occur in two phases.

Phase 1

Phase 1 mainly concerns payloads and fields that support the flowing of DMR data to EPA and determining the overall compliance picture for a facility. EPA will begin to electronically receive information from states, tribes, and territories related to inspections, violation determinations, and enforcement actions. Permit information will also need to be submitted for the full scope of permitted sources in order to support this compliance and enforcement information.

During Phase 1, EPA, states, tribes, and territories will electronically receive Discharge Monitoring Report (DMR) information from NPDES permitted sources. This is the largest volume of data for the NPDES program.

Also included in Phase 1 are the Sewage Sludge/Biosolids Annual Program Reports for the 42 states where EPA implements the Federal Biosolids Program.

Finally, by the end of Phase 1, authorized NPDES programs must also submit an implementation plan to EPA for meeting the Phase 2 data requirements.

Under the final rule, Phase 1 has two key milestone dates:

September 21, 2016

- States must transmit basic facility and permit information for all permits in addition to other data necessary for implementation of Phase 1 data collection.

December 21, 2016

- States must electronically submit inspections, violation determinations, enforcement actions, and DMRs to EPA.
- Regulated entities must submit Biosolids Annual Program Reports to EPA (in the 42 states where EPA implements the Federal Biosolids Program).
- States must submit a Phase 2 implementation plan to EPA.

Phase 2

Phase 2 will address electronically collecting, managing, and sharing all remaining NPDES program information. This information falls into two categories.

General permit coverage forms

- Notice of Intent to be covered (NOI)
- Notice of Termination (NOT)
- No Exposure Certification (NOE)
- Low Erosivity Waiver and Other Waivers from Stormwater Controls (LEW)

Program compliance reports

- Sewage Sludge/Biosolids Annual Program Reports (for the 8 states that implement the Federal Biosolids Program)
- Concentrated Animal Feeding Operation (CAFO) Annual Program
- Municipal Separate Storm Sewer System (MS4) Program Reports
- Pretreatment Program Reports
- Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs
- Sewer Overflow/Bypass Event Reports
- CWA Section 316(b) Annual Reports

Under the final rule, Phase 2 currently has one key milestone date:

December 21, 2020:

- Regulated entities must submit the above general permit and program compliance forms to the authorized NPDES program electronically.
- The authorized NPDES program must electronically submit the same data to EPA.

Gap Analysis

The primary objective of this project is to assess DOW's readiness for compliance with the requirements of the eReporting Rule. To develop this assessment, Windsor facilitated a series of conference calls with DOW staff. These calls reviewed both the information systems used by DOW to manage the NPDES program, and the current business workflows, with the purpose being to identify any gaps in the data collected and managed by DOW systems and the data requirements of the eReporting Rule, as well as any changes that may be required to existing business processes to meet the data collection and reporting requirements of the eReporting Rule.

EPA categorizes data reporting requirements to ICIS-NPDES in terms of a series of data families or "payload types" and the eReporting Rule also generally uses these same data families when referencing data elements to be reported electronically. As an organizing principle, this assessment and gap analysis project has been organized around these same payload types, which were grouped together into categories of closely related payload types. The assessment conference calls considered each of these categories in turn and considered both data management and business processes.

Appendix A provides a listing of the ICIS-NPDES payload types and indicates how each payload type will generally be supported by ADEC in the context of the eReporting Rule.

Business Processes

For each payload category, the meetings considered:

1. Whether a specific eReporting Rule requirement is relevant to DOW's program. For example, ADEC is not delegated for the Biosolids program, and so data reporting will not be required.
2. If a requirement can be met by a change to existing processes. For example, certain NOI forms are collected electronically today, and this current mechanism might be extended to support the additional needs of the eReporting Rule.
3. If a requirement will require an entirely new process to be established. For example, electronic reporting of pretreatment program reports.

Data Management

For each payload category, the meetings considered:

1. Whether the eReporting Rule data element requirements are within the scope of data to be submitted by DOW. For example, DOW does not currently manage DMR data within any State system and is considering using the EPA-provided NetDMR system to meet eReporting Rule requirements.
2. If the eReporting Rule data element requirements are met by the new DROPS to ICIS data flow, or could be met with minor updates to the current data flow.
3. If the eReporting Rule data element requirements will require an update to DROPS or another DOW system.

The following sections describe the conclusions from the assessment conference calls. For each payload category, the current information collection, management, and reporting processes are described. Then the current and future data management approach is described for the data elements included in the payload category. Finally, the known gaps between the current situation and the requirements of the eReporting Rule are described.

Individual Permits and Components

Business Processes

Most individual NPDES permits issued by ADEC are for industrial facilities or wastewater treatment facilities. A small number of individual pretreatment, MS4, and CSO permits are issued. Stormwater discharges are all handled under general permits.

Applications for new individual NPDES permits can be made using fillable PDF forms which are available on the ADEC Web site. The completed paper copies with original signature are submitted to ADEC in Anchorage. The paper document is scanned to a network location and the paper copy is routed to the relevant permit writer in Juneau, Anchorage or Fairbanks, depending upon the location of the facility. Renewal applications and applications for modifications follow the same process.

The permit writer develops the permit conditions and prepares and eventually issues the permit, including any public notice steps that may be required. Information about the permit, including the facility details, the permit details, permitted features (outfalls), and parameter limits is manually entered into DROPS by the permit writer during this process.

Once the permit has been issued, the permit and parameter limit information is also currently manually entered into the EPA ICIS-NPDES system. ADEC is currently engaged in a project to implement an automated flow of data from DROPS to the ICIS-NPDES system over the Exchange Network using the ADEC OpenNode2. This new automated data flow will replace the current manual data entry process.

Data Management

DROPS supports the management of basic individual permit information, including the facility, location, points of contact, and other details. In general, DROPS does not support specific details about individual permit components, for example, MS4 or POTW permits, although this information is manually entered into ICIS-NPDES today when appropriate.

The following table details the data elements required to be collected and reported by the eReporting Rule and indicates whether these elements are or will be supported by DROPS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Basic Facility Information			
Facility Type of Ownership	X		
Facility Site Name	X		
Facility Site Address	X		
Facility Site City	X		
Facility Site State	X		
Facility Site Zip Code	X		
Facility Site Tribal Land Indicator			Not applicable to ADEC
Facility Site Longitude	X		
Facility Site Latitude	X		

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Facility Contact Affiliation Type	X		
Facility Contact First Name	X		
Facility Contact Last Name	X		
Facility Contact Title	X		
Facility Contact E-Mail Address	X		
Facility Organization Formal Name	X		
Basic Permit Information			
NPDES ID	X		
Master General Permit Number	X		
Permit Type	X		
Permit Component	X		
Permit Issue Date	X		
Permit Effective Date	X		
Permit Modification/Amendment Date	X		
Permit Expiration Date	X		
Permit Termination Date	X		
Permit Major/Minor Status Indicator	X		
Permit Major/Minor Status Start Date	X		Will be derived by data flow to ICIS
Permit Application Total Design Flow		X	
Permit Application Total Actual Average Flow		X	
Complete Permit Application/NOI Received Date	X		
Permit Application/NOI Received Date	X		
Permit Status	X		
Master General Permit Industrial Category	X		
Permit Issuing Organization Type	X		
DMR Non-Receipt			Will be manually entered into ICIS.
DMR Non-Receipt Start Date			Will be manually entered into ICIS.
Reportable Noncompliance Tracking			Will be manually entered into ICIS.
Reportable Noncompliance Tracking Start Date			Will be manually entered into ICIS.
Applicable Effluent Limitations Guidelines		X	
Permit Compliance Tracking Status			Will be manually entered into ICIS.
Permit Compliance Tracking Status Start Date			Will be manually entered into ICIS.
RNC Status (Manual)			Will be manually entered into ICIS.
RNC Status (Manual) Year			Will be manually entered into ICIS.
RNC Status (Manual) Quarter			Will be manually entered into ICIS.
Associated NPDES ID Number			Not applicable to ADEC

Commented [RJ1]: I don't remember what this is

Commented [TC2R1]: From the Federal Register: "The applicable effluent limitations guidelines and new source performance standards in the NPDES permit (e.g., part 414—Organic chemicals, plastics, and synthetic fibers point source category). This data element also applies to SIUs and CIUs that discharge (including non-domestic wastewater delivered by truck, rail, and dedicated pipe or other means of transportation) to one or more POTWs in states where the POTW is the Control Authority."

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Associated NPDES ID Number Reason			Not applicable to ADEC
Receiving POTW ID		X	
SIC Code	X		
SIC Code Primary Indicator	X		
NAICS Code	X		
NAICS Code Primary Indicator	X		
Permittee Mailing Address	X		
Permittee Organization Formal Name	X		
Permittee City	X		
Permittee State	X		
Permittee Zip Code	X		
NPDES Data Group Number			Will be derived by data flow to ICIS
Sewage Sludge/Biosolids Information on NPDES Permit Application or Notice of Intent			
Biosolids/Sewage Sludge Management Facility Type			Not applicable to ADEC
Biosolids or Sewage Sludge Treatment Processes (Permit)			Not applicable to ADEC
Biosolids or Sewage Sludge Form (Permit)			Not applicable to ADEC
Biosolids or Sewage Sludge Management Practice (Permit)			Not applicable to ADEC
Biosolids or Sewage Sludge Pathogen Class (Permit)			Not applicable to ADEC
Biosolids or Sewage Sludge Vector Attraction Reduction Options (Permit)			Not applicable to ADEC
Biosolids or Sewage Sludge Pathogen Reduction Options (Permit)			Not applicable to ADEC
Biosolids or Sewage Sludge Amount (Permit)			Not applicable to ADEC
Animal Feeding Operation Information on NPDES Permit Application or Notice of Intent			
Facility CAAP Designation			Not applicable to ADEC
Facility CAFO Type			Not applicable to ADEC
CAFO Designation Date			Not applicable to ADEC
CAFO Designation Reason			Not applicable to ADEC
CAFO Animal Types			Not applicable to ADEC
CAFO Animal Maximum Numbers			Not applicable to ADEC
CAFO Animal Maximum Numbers in Open Confinement			Not applicable to ADEC
CAFO MLPW			Not applicable to ADEC
CAFO MLPW Amounts			Not applicable to ADEC
CAFO MLPW Amounts Units			Not applicable to ADEC
CAFO MLPW Transferred			Not applicable to ADEC
Total Number of Acres Available for Land Application			Not applicable to ADEC
CAFO MLPW Containment and Storage Type			Not applicable to ADEC

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
CAFO MLPW Containment and Storage Maximum Capacity Amounts			Not applicable to ADEC
CAFO MLPW Containment and Storage Maximum Capacity Amounts Unit			Not applicable to ADEC
Municipal Separate Storm Sewer System (MS4) Information on NPDES Permit Application or Notice of Intent			
MS4 Permit Class			Will be manually entered into ICIS.
Unique Identifier for Each Municipality Covered Under MS4 Permit			Will be manually entered into ICIS.
MS4 Public Education Program			Will be manually entered into ICIS.
MS4 Measurable Goals Associated With Public Education Program			Will be manually entered into ICIS.
MS4 Public Involvement and Participation Program			Will be manually entered into ICIS.
MS4 Measurable Goals for the Public Involvement and Participation Program			Will be manually entered into ICIS.
MS4 Illicit Discharge Detection and Elimination			Will be manually entered into ICIS.
MS4 Measurable Goals Associated With Illicit Discharge Detection and Elimination Program			Will be manually entered into ICIS.
MS4 Construction Site Stormwater Runoff Control			Will be manually entered into ICIS.
MS4 Measurable Goals Associated with the Construction Site Stormwater Runoff Control Program			Will be manually entered into ICIS.
MS4 Post- Construction Stormwater Management In New Development And Redevelopment			Will be manually entered into ICIS.
MS4 Measurable Goals Associated with the Post-Construction: Stormwater Management Program			Will be manually entered into ICIS.
MS4 Pollution Prevention/ Good Housekeeping for Municipal Operations Program			Will be manually entered into ICIS.
MS4 Additional Measures			Will be manually entered into ICIS.
POTW Information on NPDES Permit Application or Notice of Intent			
Name of Collection System		X	
Owner Type of Collection System		X	
Collection System Identifier		X	
Population of Collection System	X		
Percentage of Collection System That Is a Combined Sewer System		X	
POTW Wastewater Treatment Technology Level Description		X	
POTW Wastewater Disinfection Technology		X	
POTW Wastewater Treatment Technology Unit Operations		X	
Combined Sewer Overflow Information			
Long-Term CSO Control Plan Permit Requirements and Compliance			Will be manually entered into ICIS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Nine Minimum CSO Controls Developed			Will be manually entered into ICIS.
Nine Minimum CSO Controls Implemented			Will be manually entered into ICIS.
LTCP Submission and Approval Type			Will be manually entered into ICIS.
LTCP Approval Date			Will be manually entered into ICIS.
Enforceable Mechanism and Schedule to Complete LTCP and CSO Controls			Will be manually entered into ICIS.
Actual Date Completed LTCP and CSO Controls			Will be manually entered into ICIS.
Approved Post-Construction Compliance Monitoring Program			Will be manually entered into ICIS.
Other CSO Control Measures with Compliance Schedule			Will be manually entered into ICIS.
Pretreatment Information on NPDES Permit Application or Notice of Intent (this includes permit application data required for all new and existing POTWs [40 CFR 122.21(j)(6)]			
Pretreatment Program Required Indicator			Will be manually entered into ICIS.
Pretreatment Program Approval or Modification Date			Will be manually entered into ICIS.
Pretreatment Program Modification Type			Will be manually entered into ICIS.
Industrial User Type			Will be manually entered into ICIS.
Significant Industrial User Subject to Local Limits			Will be manually entered into ICIS.
Significant Industrial User Subject to Local Limits More Stringent Than Categorical Standards			Will be manually entered into ICIS.
Applicable Categorical Standards			Will be manually entered into ICIS.
Significant Industrial User Wastewater Flow Rate			Will be manually entered into ICIS.
Industrial User Causing Problems at POTW			Will be manually entered into ICIS.
Receiving RCRA Waste			Will be manually entered into ICIS.
Receiving Remediation Waste			Will be manually entered into ICIS.
Control Authority Identifier			Will be manually entered into ICIS.

Gap Analysis

Business Processes

The eReporting Rule does not mandate electronic collection of individual permit information from the regulated community and ADEC's current business processes related to collection and management of individual permits are compliant with the eReporting Rule.

ADEC will also begin submitting data to ICIS-NPDES electronically in the near future, which will satisfy much of the eReporting Rule requirements. As discussed below, some changes will be necessary to the automated data flow to better support the individual data element reporting requirements of the eReporting Rule.

Basic Individual Permit Information

In general, DROPS is able to support most of the basic individual permit data element requirements of the eReporting Rule today, and some additional data elements will be added to DROPS to provide better support.

The eReporting Rule includes some new data element reporting requirements specific to how violations of DMR non-receipts, permit compliance, and Reportable Non-Compliance should be tracked by ICIS-NPDES. These attributes can be defined at the permit level and generally instruct ICIS-NPDES as to whether to handle compliance tracking for the permit directly, or to defer to state-reported compliance data. ADEC will enter this information manually into ICIS-NPDES going forward.

Biosolids Permits

ADEC is not delegated for the NPDES biosolids program and will not report information for permits with biosolids components to ICIS-NPDES.

CAFO Permits

ADEC does not issue NPDES permits to CAFO facilities and will not report information for permits with biosolids components to ICIS-NPDES.

MS4 Permits

ADEC manages a small number of MS4 permits and DROPS does not currently support the additional detailed data elements required by the eReporting Rule for these facilities. ADEC does not feel that there is sufficient benefit to adding this support to DROPS in order to support automated data submission to ICIS-NPDES and ADEC program staff will continue to enter this information manually into ICIS-NPDES.

POTW Permits

DROPS does not currently support the additional detailed data elements required by the eReporting Rule for POTWs. Since ADEC does manage a number of such facilities under individual permits, ADEC plans to add support for these additional detailed elements to DROPS in order to support automated data submission to ICIS-NPDES in the future.

CSO Permits

ADEC manages a small number of CSO permits and DROPS does not currently support the additional detailed data elements required by the eReporting Rule for these facilities. ADEC does not feel that there is sufficient benefit to adding this support to DROPS in order to support automated data submission to ICIS-NPDES and ADEC program staff will continue to enter this information manually into ICIS-NPDES.

Pretreatment Permits

ADEC manages a small number of pretreatment permits and DROPS does not currently support the additional detailed data elements required by the eReporting Rule for these facilities. ADEC does not feel that there is sufficient benefit to adding this support to DROPS in order to support automated data submission to ICIS-NPDES and ADEC program staff will continue to enter this information manually into ICIS-NPDES.

General Permits and Components

Business Processes

ADEC has 27 general permits for various activities regulated under the NPDES program. Notices of Intent (NOI) to obtain coverage can be submitted to ADEC electronically for approximately half of these general permits using the Water Online Application System (OASys). In addition to NOIs, OASys also supports Notices of Termination, NOI modifications, No Exposure Certifications, and annual compliance reports for these same general permits. ADEC plans to continue to add additional forms to those supported by OASys, typically as general permits are issued or reissued.

The following general permits are currently available for electronic submission using OASys:

- AKR100000 Construction Stormwater (eNOI, eNOT, eNOI Modification, No Exposure Certification)
- AKR060000 Multi-Sector Industrial Stormwater (eNOI, No Exposure Certification, Annual Report)
- AKG002000 Excavation Dewatering GP (eNOI, eNOT)
- AKG003000 Hydrostatic and Aquifer Pump Testing GP (eNOI, eNOT)
- AKG523000 Offshore Seafood Processors GP (eNOI, eNOI Modification, Annual Report)
- AKG370000 Mechanical Placer Miners GP (Annual Report only)
- AKG371000 Medium Size Suction Dredges GP (Annual Report only)
- AKG375000 Small Suction Dredges GP (Annual Report only)

ADEC is planning to have the following general permits available for electronic submission using OASys by 2020:

- AKG130000 Aquacultural Facilities in Alaska GP
- AKG521000 Onshore Seafood Processors GP
- AKG320000 Statewide Pipelines GP
- AKG315000 Cook Inlet Oil & Gas Exploration GP
- AKG315100 Mobile Oil and Gas Exploration in Cook Inlet
- AKG332000 North Slope Oil and Gas GP
- AKG370000 Mechanical Placer Miners GP
- AKG371000 Medium Size Suction Dredges GP
- AKG374000 Norton Sound Large Dredge Placer Miners GP
- AKG375000 Small Suction Dredges GP (eNOI is High Priority for new development)
- AKG572000 Secondary Treatment to Surface Water GP
- AKG573000 Small Domestic Lagoon to Surface Water GP
- AKGXXXXXX Residential Marine Outfalls in Southeast Alaska GP
- AKG870000 Pesticide General Permit

Finally, electronic submission may or may not be enabled through OASys for the following general permits by 2020:

- AKG250000 Non-Contact Cooling Water GP (Expires 2019)
- AKG380000 Drinking Water Filter Backwash GP (Expires 2019)
- AKG426000 Graywater from Facilities Related to Oil and Gas GP (Expires 2017)
- AKG700000 Pre-1985 Log Transfer Facilities GP (Expires 2017)
- AKG701000 Post-1985 Log Transfer Facilities GP (Expires 2017)

Approximately 1500 form submissions are received electronically through OASys each year. The user is able to enter data into an electronic form, electronically sign the form, and pay any fees that may be due.

For general permit number AKR100000 – Stormwater Construction General (CGP), the information from the NOI, NOT or NOI modification is automatically loaded into DROPS in an issued status and the permit coverage document is stored in the ADEC document repository. The permit document is also automatically posted to the Water Permit Search system.

For other types of general permit, the electronic form submission is sent as an email to different program staff depending on the type of permit. Information from the form is then entered manually into DROPS and the permit coverage document is created and posted to the ADEC document repository and Water Permit Search manually.

It is expected that all new NOIs to be supported by OASys will eventually adopt the fully automated data management workflow for CGPs described above, unless for some reason the data isn't supported in DROPS.

General permit application forms that are not supported by OASys can be completed using fillable PDF forms on the ADEC Web site and then be submitted manually to ADEC. The form instructions will indicate that the form should be sent to different offices depending on the type of permit. Again, information from the form is then entered manually into DROPS and the permit coverage document is created and posted to the ADEC document repository and Water Permit Search manually.

Currently CGP general permit coverages are entered manually into the EPA ICIS-NPDES system only if there is a compliance action or enforcement action associated with them. The new automated ICIS-NPDES data flow follows this same approach.

> **Commented [RJ3]:** I believe this only applies to CGP general permit coverages. All other general permit coverages are entered into ICIS when issued.

Data Management

DROPS supports the management of basic general permit information, including the facility, location, points of contact, and other details. In addition, DROPS also supports most of the significant specific details about general permit components required by the eReporting Rule, specifically related to construction and industrial stormwater coverages.

The following table details the data elements required to be collected and reported by the eReporting Rule and indicates whether these elements are or will be supported by DROPS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Basic Facility Information			
Facility Type of Ownership	X		
Facility Site Name	X		
Facility Site Address	X		
Facility Site City	X		
Facility Site State	X		
Facility Site Zip Code	X		
Facility Site Tribal Land Indicator			Not applicable to ADEC
Facility Site Longitude	X		
Facility Site Latitude	X		
Facility Contact Affiliation Type	X		

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Facility Contact First Name	X		
Facility Contact Last Name	X		
Facility Contact Title	X		
Facility Contact E-Mail Address	X		
Facility Organization Formal Name	X		
Basic Permit Information			
NPDES ID	X		
Master General Permit Number	X		
Permit Type	X		
Permit Component	X		
Permit Issue Date	X		
Permit Effective Date	X		
Permit Modification/Amendment Date	X		
Permit Expiration Date	X		
Permit Termination Date	X		
Permit Major/Minor Status Indicator	X		
Permit Major/Minor Status Start Date	X		Will be derived by data flow to ICIS
Permit Application Total Design Flow		X	
Permit Application Total Actual Average Flow		X	
Complete Permit Application/NOI Received Date	X		
Permit Application/NOI Received Date	X		
Permit Status	X		
Master General Permit Industrial Category	X		
Permit Issuing Organization Type	X		
DMR Non-Receipt			Will be manually entered into ICIS.
DMR Non-Receipt Start Date			Will be manually entered into ICIS.
Reportable Noncompliance Tracking			Will be manually entered into ICIS.
Reportable Noncompliance Tracking Start Date			Will be manually entered into ICIS.
Applicable Effluent Limitations Guidelines		X	
Permit Compliance Tracking Status			Will be manually entered into ICIS.
Permit Compliance Tracking Status Start Date			Will be manually entered into ICIS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
RNC Status (Manual)			Will be manually entered into ICIS.
RNC Status (Manual) Year			Will be manually entered into ICIS.
RNC Status (Manual) Quarter			Will be manually entered into ICIS.
Associated NPDES ID Number			Not applicable to ADEC
Associated NPDES ID Number Reason			Not applicable to ADEC
Receiving POTW ID		X	
SIC Code	X		
SIC Code Primary Indicator	X		
NAICS Code	X		
NAICS Code Primary Indicator	X		
Permittee Mailing Address	X		
Permittee Organization Formal Name	X		
Permittee City	X		
Permittee State	X		
Permittee Zip Code	X		
Residual Designation Determination Code		X	
Electronic Reporting Waiver Type		X	
Electronic Reporting Waiver Expiration Date		X	
Electronic Submission Type (General Permit Reports)			Will be derived by data flow to ICIS
NPDES Data Group Number			Will be derived by data flow to ICIS
Construction and Industrial Stormwater Information [from the permitting authority derived from the No Exposure Certification, Low Erosivity Waiver, and Other Waiver From Stormwater Controls (see Exhibit 1 to 40 CFR 122.26(b)(15)]			
No Exposure Certification Approval Date	X		
Low Erosivity Waiver or Other Waiver From Stormwater Controls Approval Date	X		
Construction Stormwater Information on NPDES Permit Application, Notice of Intent, or Waiver Request [including construction activity requiring permit coverage under 40 CFR 122.26(b)(14)(x)]			
Total Area of the Site		X	
Total Activity Area (Construction)	X		
Post-Construction Total Impervious Area			Not applicable to ADEC
Proposed Stormwater Best Management Practices for Construction Activities			Not applicable to ADEC
Post-Construction Stormwater Best Management Practices for Construction Activities			Not applicable to ADEC
Soil and Fill Material Description			Not applicable to ADEC
Runoff Coefficient of the Site (Post-Construction)			Not applicable to ADEC

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Estimated Construction Project Start Date	X		
Estimated Construction Project End Date	X		
Industrial Stormwater Information on NPDES Permit Application [excluding construction activity requiring permit coverage under 40 CFR 122.26(b)(14)(x)]			
Total Surface Area Drained (Industrial)		X	
Total Impervious Surface Area (Industrial)		X	
Proposed Stormwater Best Management Practices (Industrial)			Not applicable to ADEC
POTW Information on NPDES Permit Application or Notice of Intent			
Name of Collection System		X	
Owner Type of Collection System		X	
Collection System Identifier		X	
Population of Collection System	X		
Percentage of Collection System That Is a Combined Sewer System		X	
POTW Wastewater Treatment Technology Level Description		X	
POTW Wastewater Disinfection Technology		X	
POTW Wastewater Treatment Technology Unit Operations		X	
Cooling Water Intake Information on NPDES Permit Application or Notice of Intent			
Cooling Water Intake Applicable Subpart		X	
Design Intake Flow for Cooling Water Intake Structure(s)		X	
Actual Intake Flow for Cooling Water Intake Structure(s)		X	
Location Type for Cooling Water Intake Structure		X	
Actual Through-Screen Velocity		X	
Source Water for Cooling Purposes		X	
Cooling Water Intake Structure Chosen Compliance Method		X	
Source Water Baseline Biological Characterization Data: Threatened or Endangered Status		X	
CWA section 316(a) Thermal Variance Information on NPDES Permit Application or Notice of Intent			
Thermal Variance Request Type		X	
Public Notice of Section 316(a) Requests		X	
Thermal Variance Granted Date		X	

Gap Analysis

Business Processes

OASys already provides the functionality required to satisfy the core requirement of the eReporting Rule to receive general permit applications electronically by 2020. Many general permit applications are already being received by OASys, and although not all permit types are supported today, ADEC has plans to enable electronic form submissions for the majority of the remaining general permit types by 2020.

ADEC will need to develop a strategy for the support of all general permit forms using OASys by 2020.

As with individual permits, general permit coverages will soon be submitted to ICIS-NPDES electronically through the new data flow, which will satisfy much of the eReporting Rule requirements. However, the automated data flow will need to be extended to include all general permit coverages in the scope of the data submission, rather than just those subject to a compliance or enforcement action.

> **Commented [RJ4]:** I think the automated data flow should include all GP coverages in scope. Only the CGP general permits will be limited to those subject to compliance or enforcement action. Will need to confirm this with Program Staff.

Basic General Permit Coverage Information

In common with individual permits, in general, DROPS is able to support most of the basic general permit data element requirements of the eReporting Rule today, and some additional data elements will be added to DROPS to provide better support.

Also as with individual permits, ADEC will continue to manually enter the new compliance tracking data elements supported by the eReporting Rule into ICIS-NPDES.

Construction and Industrial Stormwater Permit Coverages

In general the DROPS system will support most of the data elements required by the eReporting Rule related to stormwater permit coverages, with some additional data elements to be added to DROPS.

The remaining data elements included by the eReporting Rule for stormwater permits components are only applicable to individual stormwater permits and ADEC does not currently issue individual stormwater permits.

POTW Permits

DROPS does not currently support the additional detailed data elements required by the eReporting Rule for POTWs. Since ADEC does manage a number of such facilities under general permit coverages, ADEC plans to add support for these additional detailed elements to DROPS in order to support automated data submission to ICIS-NPDES in the future.

Non-contact Cooling Water

DROPS does not currently support the additional detailed data elements required by the eReporting Rule for permitted non-contact cooling water intakes. Since ADEC does manage a number of general permit coverages with such intakes, ADEC plans to add support for these additional detailed elements to the outfall data management tables in DROPS in order to support automated data submission to ICIS-NPDES in the future.

Parameter Limits, Limit Sets, and Permitted Features

Business Processes

Basic information about outfalls or discharge points is provided by the applicant on the individual or general permit PDF paper application forms or OASys electronic forms. Permit writers fully define the

outfall when developing the permit including providing a unique and persistent identifier for the permitted feature. For general permit coverages, the identifier is generally defaulted to 001.

Parameter limits and limit sets are defined by the permit writer when developing the permit conditions according to the requirements of the NPDES program. As the permit is being developed, the permitted features, parameter limits and limit sets are entered into DROPS, with limit sets being defined in DROPS as "monitoring points". It should be noted that certain parameter limit conditions can't be entered into DROPS and are only managed in ICIS-NPDES, such as enforcement limits.

Once the permit has been issued, the permitted feature, limit set, and parameter limit data is currently manually entered into the EPA ICIS-NPDES system, and the new automated ICIS-NPDES data flow will replace this current manual data entry process. During the development of the data flow, a number of changes were made to DROPS to support ICIS-NPDES data requirements, which are independent of the eReporting Rule requirements. The data flow also performs a number of transformations on the data in DROPS in order to meet the needs of the ICIS-NPDES data submission process, including generating split limit sets when needed because a limit set starts in the middle of a reporting period, and automatically calculating limit season numbers.

Data Management

For practical purposes, the eReporting Rule does not significantly change the list of data elements required for this payload category from those required by the ICIS-NPDES data flow today. All mandatory data elements required by ICIS-NPDES are supported in DROPS and this data is already supported by the new data flow currently undergoing testing.

The following table details the data elements required to be collected and reported by the eReporting Rule and indicates whether these elements are or will be supported by DROPS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Permitted Feature Information			
Permitted Feature Application Actual Average Flow (MGD)	X		
Permitted Feature Identifier (Permit)	X		
Permitted Feature Type	X		
Receiving Waterbody Name for Permitted Feature	X		
Permitted Feature Longitude	X		
Permitted Feature Latitude	X		
Limit Set Information			
Limit Set Designator	X		
Limit Set Type	X		
Modification Effective Date (Limit Set)			Will be derived by data flow to ICIS
Modification Type (Limit Set)			Will be derived by data flow to ICIS
Initial Monitoring Date	X		
Initial DMR Due Date	X		
Number of Report Units	X		

Commented [RJ5]: Do we have an example of a parameter limit condition not able to be entered into DROPS?

Commented [TC6R5]: Enforcement limits were one example of limit types discussed that are only to be managed in ICIS and not in DROPS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Number of Submission Units	X		
Limit Set Status		X	
Limit Set Status Start Date		X	
Limit Information			
Monitoring Location Code	X		
Limit Season Number			Currently derived by data flow to ICIS
Limit Start Date	X		
Limit End Date	X		
Change of Limit Status Indicator			Will be manually entered into ICIS.
Limit Stay Type			These fields will be handled using a Stay Modification type.
Limit Stay Start Date			These fields will be handled using a Stay Modification type.
Limit Stay End Date			These fields will be handled using a Stay Modification type.
Reason for Limit Stay		X	
Stay Limit Value			These fields will be handled using a Stay Modification type.
Limit Type			Will be derived by data flow to ICIS. All limits are enforceable.
Enforcement Action ID			No enforcement action limits tracked in DROPS.
Final Order ID			No enforcement action limits tracked in DROPS.
Modification Effective Date	X		
Modification Type	X		
Limit Parameter Code	X		
Limit Months	X		
Limit Value Type	X		
Limit Quantity or Concentration Units	X		
Statistical Base Code	X		
Optional Monitoring Code			Not applicable to ADEC
Limit Value Qualifier	X		
Limit Value	X		

Gap Analysis

Business Processes

Permitted features, limit sets, and parameter limits will soon be submitted to ICIS-NPDES electronically through the new data flow, which will satisfy the eReporting Rule requirements. No additional business process changes will be required for this payload category.

Limit Set Status and Modifications

DROPS currently tracks a status value for the monitoring point, but this is a generic versioning field that is set to inactive automatically by DROPS whenever a permit version is superseded by a new version. Therefore, new fields will need to be added to DROPS to track the limit set status and status start date.

Changes will need to be made to the ICIS-NPDES data flow to derive modifications to limits sets automatically.

Limit Stays

A new element will be added to DROPS to record the reason for a limit stay. All other fields to support stay limits should be supported through the existing fields supporting limit modifications today.

Limit Modifications and Status

Modification effective date and type was recently added to DROPS to allow tracking of a limit modification being made outside of a full permit reissuance. A mechanism will need to be added to DROPS to track the limit status.

Enforcement Limits

There are generally only a few cases where limits are modified through enforcement actions. These are tracked as modifications in DROPS and then as two limits in ICIS-NPDES, a modification to the base limit, and an enforcement limit. The enforcement limits will continue to be entered manually into ICIS-NPDES and no modifications will be made to DROPS for this.

Program Reports

Business Processes

Various program compliance reports are collected by ADEC under the terms of issued NPDES permits. Only one of these program reports is currently available for electronic submission through OASys, the Stormwater Industrial Permit Annual Report. Most other program compliance forms are received in paper form, with a small number received via email as PDF forms.

> **Commented [RJ7]:** Many General Permits and Individual Permits require permittees to submit an annual report to DEC. Are these considered Program Reports?

> **Commented [TC8R7]:** It depends on whether the report conforms to one of the expected program reports and if you plan to share more than the received date and other mechanics of the report. Otherwise, it's perhaps better to consider this a narrative condition.

The program reports are reviewed for compliance with permit conditions and are filed in the ADEC document repository.

Currently no data is recorded in DROPS for these program compliance reports, but a recent modification will allow the report received date to be recorded in the DROPS compliance schedule component alongside the scheduled date for the report. ADEC plans to use this feature to begin tracking the receipt date for Stormwater Industrial Permit Annual Reports.

Detailed program report information is not collected in DROPS currently and ADEC staff do not believe there is any value in modifying DROPS to handle this detailed report data.

The new ICIS-NPDES data flow does not currently include any program compliance report payload types.

Data Management

The eReporting Rule increases the list of data elements required for program compliance reports from those required by the ICIS-NPDES data flow today. Many of these data elements are related to the details of specific report types. Few of these data elements are collected in DROPS.

The following table details the data elements required to be collected and reported by the eReporting Rule and indicates whether these elements are or will be supported by DROPS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Compliance Monitoring Activity Information (Periodic Program Reports)			
Program Report Received Date			Will be derived from DROPS for SW Industrial Reports and manually entered into ICIS for all remaining reports.
Program Report Event ID			Will be derived from DROPS for SW Industrial Reports and manually entered into ICIS for all remaining reports.
Start Date of Reporting Period (Program Report)			Will be derived from DROPS for SW Industrial Reports and manually entered into ICIS for all remaining reports.
End Date of Reporting Period (Program Report)			Will be derived from DROPS for SW Industrial Reports and manually entered into ICIS for all remaining reports.
NPDES Data Group Number (Program Report)			Will be derived from DROPS for SW Industrial Reports and manually entered into ICIS for all remaining reports.
Compliance Monitoring Activity Information (Data Elements Specific to Sewage Sludge/Biosolids Annual Program Reports)			Not applicable to ADEC
Biosolids or Sewage Sludge Treatment Processes			Not applicable to ADEC
Biosolids or Sewage Sludge Analytical Methods			Not applicable to ADEC
Biosolids or Sewage Sludge Form			Not applicable to ADEC
Biosolids or Sewage Sludge Management Practice			Not applicable to ADEC
Biosolids or Sewage Sludge Pathogen Class			Not applicable to ADEC
Biosolids or Sewage Sludge Amount (Program Report)			Not applicable to ADEC
Biosolids or Sewage Sludge Pathogen Reduction Options			Not applicable to ADEC
Biosolids or Sewage Sludge Vector Attraction Reduction Options			Not applicable to ADEC
Biosolids or Sewage Sludge Monitored Parameter			Not applicable to ADEC
Biosolids or Sewage Sludge Monitored Parameter Value			Not applicable to ADEC
Biosolids or Sewage Sludge Monitored Parameter Units			Not applicable to ADEC

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Biosolids or Sewage Sludge Monitored Parameter End Date			Not applicable to ADEC
Biosolids or Sewage Sludge - Surface Disposal Maximum Allowable Pollutant Concentration			Not applicable to ADEC
Biosolids or Sewage Sludge - Land Application or Surface Disposal Deficiencies			Not applicable to ADEC
Compliance Monitoring Activity Information (Data Elements Specific to CAFO Annual Program Reports)			Not applicable to ADEC
CAFO Animal Types (Program Report)			Not applicable to ADEC
CAFO Animal Maximum Number (Program Report)			Not applicable to ADEC
CAFO Animal Maximum Number in Open Confinement (Program Report)			Not applicable to ADEC
CAFO MLPW (Program Report)			Not applicable to ADEC
CAFO MLPW Amounts (Program Report)			Not applicable to ADEC
CAFO MLPW Amounts Units (Program Report)			Not applicable to ADEC
CAFO MLPW Transferred (Program Report)			Not applicable to ADEC
Total Number of Acres for Land Application Covered by the Nutrient Management Plan (Program Report)			Not applicable to ADEC
Total Number of Acres Used for Land Application (Program Report)			Not applicable to ADEC
Discharge Type (Program Report)			Not applicable to ADEC
Discovery Dates of Discharges from Production Area (Program Report)			Not applicable to ADEC
Duration of Discharges from Production Area (Program Report)			Not applicable to ADEC
Approximate Volume of Discharge from Production Area (Program Report)			Not applicable to ADEC
Whether NMP Approved or Developed by Certified Planner (Program Report)			Not applicable to ADEC
CAFO MLPW Nitrogen Content (Program Report)			Not applicable to ADEC
CAFO MLPW Phosphorus Content (Program Report)			Not applicable to ADEC
CAFO MLPW Nitrogen or Phosphorus Units (Program Report)			Not applicable to ADEC
CAFO MLPW Nitrogen or Phosphorus Form (Program Report)			Not applicable to ADEC
Field Identification Number (Program Report)			Not applicable to ADEC
Actual Crop(s) Planted for Each Field (Program Report)			Not applicable to ADEC
Actual Crop Yield(s) for Each Field (Program Report)			Not applicable to ADEC
Actual Crop Yield(s) for Each Field Units (Program Report)			Not applicable to ADEC
Method for Calculating Maximum Amounts of Manure, Litter, and Process Wastewater (Program Report)			Not applicable to ADEC
CAFO MLPW Land Application For Each Field (Program Report)			Not applicable to ADEC

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
CAFO MLPW Land Application Maximum Amount For Each Field (Program Report)			Not applicable to ADEC
CAFO MLPW Land Application Actual Amount For Each Field (Program Report)			Not applicable to ADEC
CAFO MLPW Land Application For Each Field Unit (Program Report)			Not applicable to ADEC
Nitrogen Soil Test Measurement (Narrative Rate Approach) (Program Report)			Not applicable to ADEC
Phosphorus Soil Test Measurement (Narrative Rate Approach) (Program Report)			Not applicable to ADEC
Soil Test Measurement Form (Narrative Rate Approach) (Program Report)			Not applicable to ADEC
Soil Test Measurement Unit(s) (Narrative Rate Approach) (Program Report)			Not applicable to ADEC
Nitrogen Amount of Any Supplemental Fertilizer Applied (Program Report)			Not applicable to ADEC
Phosphorus Amount of Any Supplemental Fertilizer Applied (Program Report)			Not applicable to ADEC
Supplemental Fertilizer Applied Units (Program Report)			Not applicable to ADEC
Compliance Monitoring Activity Information (Data Elements Specific to Municipal Separate Storm Sewer System Program Reports)			Will be manually entered into ICIS.
MS4 Reliance on Other Government Entities Status			Will be manually entered into ICIS.
MS4 Reliance on Other Government Entities: Permit Component Status			Will be manually entered into ICIS.
MS4 Permit Components Descriptions and Measurable Goals			Will be manually entered into ICIS.
Changes to MS4 Permit Components and Measurable Goals			Will be manually entered into ICIS.
Status of Compliance with each Minimum Control Measure			Will be manually entered into ICIS.
Progress and Summary of Results with Each Minimum Control Measure			Will be manually entered into ICIS.
MS4 Enforcement Action Type			Will be manually entered into ICIS.
MS4 Enforcement Action Number			Will be manually entered into ICIS.
MS4 Municipality Enforcement Agency			Will be manually entered into ICIS.
MS4 Industrial Stormwater Control			Will be manually entered into ICIS.
Compliance Monitoring Activity Information (Data Elements Specific to Pretreatment Program Reports, SIU Periodic Compliance Reports in Municipalities without an Approved Pretreatment Program)			Will be manually entered into ICIS.
SNC Published			Will be manually entered into ICIS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
SNC with Pretreatment Enforceable Compliance Schedule Status			Will be manually entered into ICIS.
Local Limits Adoption Date			Will be manually entered into ICIS.
Local Limits Evaluation Date			Will be manually entered into ICIS.
Local Limits Pollutants			Will be manually entered into ICIS.
POTW Discharge Contamination Indicator (Program Report)			Will be manually entered into ICIS.
POTW Biosolids or Sewage Sludge Contamination Indicator (Program Report)			Will be manually entered into ICIS.
Industrial User Control Mechanism Status			Will be manually entered into ICIS.
Industrial User Control Mechanism Effective Date			Will be manually entered into ICIS.
Industrial User Control Mechanism Expiration Date			Will be manually entered into ICIS.
SNC with Pretreatment Standards or Limits (Program Report)			Will be manually entered into ICIS.
SNC with Pretreatment Standards or Limits Pollutants (Program Report)			Will be manually entered into ICIS.
SNC with Reporting Requirements (Program Report)			Will be manually entered into ICIS.
SNC with Other Control Mechanism Requirements (Program Report)			Will be manually entered into ICIS.
Listing of Months in SNC			Will be manually entered into ICIS.
Number of Industrial User Inspections by Control Authority			Will be manually entered into ICIS.
Number of Industrial User Sampling Events by Control Authority			Will be manually entered into ICIS.
Number of Required Industrial User Self-Monitoring Events			Will be manually entered into ICIS.
Actual Number of Industrial User Self-Monitoring Events			Will be manually entered into ICIS.
Types of Industrial User Enforcement Action			Will be manually entered into ICIS.
Number of Industrial User Enforcement Actions			Will be manually entered into ICIS.
Industrial User Cash Civil Penalty Amount Assessed			Will be manually entered into ICIS.
Industrial User Cash Civil Penalty Amount Collected			Will be manually entered into ICIS.
Industrial User POTW Discharge Contamination Indicator (Program Report)			Will be manually entered into ICIS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Industrial User Biosolids or Sewage Sludge Contamination Indicator (Program Report)			Will be manually entered into ICIS.
Industrial User Wastewater Flow Rate (Program Report)			Will be manually entered into ICIS.
Middle-Tier Significant Industrial User Reduced Reporting Status			Will be manually entered into ICIS.
Non-Significant Categorical Industrial User (NSCIU) Certification Submitted to Control Authority			Will be manually entered into ICIS.
Notification of Changed Discharge Submission			Will be manually entered into ICIS.
Compliance Monitoring Activity Information (Data Elements Specific to Sewer Overflow/Bypass Event Reports)			Will be manually entered into ICIS.
Sewer Overflow/Bypass Identifier			Will be manually entered into ICIS.
Sewer Overflow Longitude for Unpermitted Feature (Sewer Overflow/Bypass Event Report)			Will be manually entered into ICIS.
Sewer Overflow Latitude for Unpermitted Feature (Sewer Overflow/Bypass Event Report)			Will be manually entered into ICIS.
Type of Sewer Overflow/Bypass (Sewer Overflow/Bypass Event Report)			Will be manually entered into ICIS.
Type of Sewer Overflow/Bypass Structure			Will be manually entered into ICIS.
Sewer Overflow/Bypass Cause			Will be manually entered into ICIS.
Duration of Sewer Overflow/Bypass (hours) (Sewer Overflow/Bypass Event Report)			Will be manually entered into ICIS.
Sewer Overflow/Bypass Discharge Volume (gallons) (Sewer Overflow/Bypass Event Report)			Will be manually entered into ICIS.
Receiving Waterbody Name for Unpermitted Feature (Sewer Overflow/Bypass Event Report)			Will be manually entered into ICIS.
Wet Weather Occurrence for Sewer Overflow/Bypass Status			Will be manually entered into ICIS.
Corrective Actions Taken or Planned for Sewer Overflow/Bypass (Sewer Overflow/Bypass Event Report)			Will be manually entered into ICIS.
Type of Potential Impact of Sewer Overflow/Bypass (Sewer Overflow/Bypass Event Report)			Will be manually entered into ICIS.
Compliance Monitoring Activity Information (Data Elements Specific to CWA section 316(b) Annual Reports)			Will be manually entered into ICIS.
CWA Section 316(b) Biological Monitoring - Species Name (Program Report)			Will be manually entered into ICIS.
CWA Section 316(b) Biological Monitoring - Species Number (Program Report)			Will be manually entered into ICIS.
CWA Section 316(b) Biological Monitoring - Threatened or Endangered Status (Program Report)			Will be manually entered into ICIS.
CWA Section 316(b) Biological Monitoring - Species Impinged and Entrained (Program Report)			Will be manually entered into ICIS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
CWA Section 316(b) Biological Monitoring - Applicable Measures to Protect Designated Critical Habitat (Program Report)			Will be manually entered into ICIS.

Gap Analysis

Business Processes

Only the Stormwater Industrial Permit Annual Report can currently be received electronically through OASys. To meet the eReporting Rule requirement that all program compliance reports be received by delegated agencies by 2020, additional electronic forms will be added to OASys.

This may be accomplished using a simple "shell" submission form which will capture the basic report details and allow the permittee to attach PDF files containing the detailed report information. This will meet the eReporting Rule requirements for enabling electronic report submissions, without requiring complex form designs to be included in OASys.

Automated Data Flow for Stormwater Industrial Annual Reports

With the recent modifications, basic report receipt information can now be recorded in DROPS. ADEC plans to use this functionality to track receipt of Stormwater Industrial Permit Annual Report submissions, but other report types will likely not be recorded in the same way (pretreatment, CSO, SSO, and MS4 reports).

The automated data flow to ICIS-NPDES will be extended to extract and submit the receipt information for Stormwater Industrial Permit Annual Reports.

Manual Report Data Entry into ICIS-NPDES

ADEC currently has no plans to report receipt information in DROPS for reports other than Stormwater Industrial Permit Annual Reports. ADEC also has no plans to extend DROPS to track the detailed data elements required by the eReporting Rule.

Information about the receipt of reports other than the Stormwater Industrial Permit Annual Report, and all detailed data elements will be entered manually into ICIS-NPDES to meet the eReporting Rule requirements.

Discharge Monitoring Reports

Business Processes

Discharge monitoring reports (DMRs) are currently received on paper and entered manually into ICIS-NPDES by ADEC staff. DROPS does not manage any DMR information.

Data Management

The following table details the data elements required to be collected and reported by the eReporting Rule and indicates whether these elements are or will be supported by DROPS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Compliance Monitoring Activity Information (Discharge Monitoring Report)			
Limit Set Designator (Compliance Monitoring Activity)			Supported through use of NetDMR
Parameter Code (Compliance Monitoring Activity)			Supported through use of NetDMR
Monitoring Location Code (Compliance Monitoring Activity)			Supported through use of NetDMR
Limit Season Number (Compliance Monitoring Activity)			Supported through use of NetDMR
Monitoring Period End Date (Compliance Monitoring Activity)			Supported through use of NetDMR
No Data Indicator (NODI) (Compliance Monitoring Activity)			Supported through use of NetDMR
Value (Compliance Monitoring Activity)			Supported through use of NetDMR
Quantity or Concentration Units (Compliance Monitoring Activity)			Supported through use of NetDMR
Value Received Date (Compliance Monitoring Activity)			Supported through use of NetDMR
Value Type (Compliance Monitoring Activity)			Supported through use of NetDMR
Value Qualifier (Compliance Monitoring Activity)			Supported through use of NetDMR

Gap Analysis

Business Processes

The eReporting Rule requires that DMRs are submitted electronically by facilities for all permits by December 21, 2016, with this data being submitted to ICIS-NPDES. ADEC is currently in the process of implementing the EPA-provided NetDMR system to meet these requirements for data collection and data submission.

Compliance Monitoring Activities and Components

Business Processes

Basic information about all compliance monitoring inspections conducted by ADEC inspectors is entered into DROPS, including the type of inspection and the inspection date. Any violations that are discovered are tracked against enforcement actions (see following section).

The inspection is also currently manually entered into the EPA ICIS-NPDES system and the new automated data flow will replace the current manual data entry process.

Data Management

DROPS supports the management of the basic inspection information required by the eReporting Rule.

The following table details the data elements required to be collected and reported by the eReporting Rule and indicates whether these elements are or will be supported by DROPS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Compliance Monitoring Activity Information (General)			
Compliance Monitoring Identifier	X		
Permitted Feature Identifier (Compliance Monitoring Activity)			Not applicable to ADEC
Electronic Submission Type (Compliance Monitoring Activity)			Will be derived by data flow to ICIS
Compliance Monitoring Activity Information (General Data Generated from Authorized NPDES Programs and EPA)			
Compliance Monitoring Activity Actual End Date	X		
Compliance Monitoring Activity			Will be derived by data flow to ICIS
Compliance Monitoring Type	X		
Biomonitoring Test Type			Not applicable to ADEC
Compliance Monitoring Action Reason			Will be derived by data flow to ICIS
Was this a State, Federal or Joint (State/Federal) Inspection?	X		
Programs Evaluated			Will be derived by data flow to ICIS
Compliance Monitoring Activity Information (Program Data Generated from Authorized NPDES Programs and EPA)			
Deficiencies Identified Through the Biosolids/Sewage Sludge Compliance Monitoring			Not applicable to ADEC
Deficiencies Identified Through the MS4 Compliance Monitoring		X	
Deficiencies Identified Through the Pretreatment Compliance Monitoring		X	
Deficiencies Identified Through the Sewer Overflow/Bypass Compliance Monitoring		X	
Compliance Monitoring Activity Information (AFO/CAFO Program Data Generated from Authorized NPDES Programs and EPA)			
Animal Types (Inspection)			Not applicable to ADEC
Animal Numbers (Inspection)			Not applicable to ADEC
Animal Numbers in Open Confinement (Inspection)			Not applicable to ADEC
MLPW Containment and Storage Type (Inspection)			Not applicable to ADEC
MLPW Containment and Storage Type Within Design Capacity (Inspection)			Not applicable to ADEC
AFO/CAFO Unauthorized Discharges (Inspection)			Not applicable to ADEC
Permit Requirements Implementation (Inspection)			Not applicable to ADEC

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Compliance Monitoring Activity Information (Pretreatment Periodic Compliance Reports for Significant Industrial Users (SIUs) and Categorical Industrial Users (CIUs) when EPA or the State is the Control Authority)			
Limit Set Designator (Compliance Monitoring Activity)			Not applicable to ADEC
Parameter Code (Compliance Monitoring Activity)			Not applicable to ADEC
Monitoring Location Code (Compliance Monitoring Activity)			Not applicable to ADEC
Limit Season Number (Compliance Monitoring Activity)			Not applicable to ADEC
Monitoring Period End Date (Compliance Monitoring Activity)			Not applicable to ADEC
No Data Indicator (NODI) (Compliance Monitoring Activity)			Not applicable to ADEC
Value (Compliance Monitoring Activity)			Not applicable to ADEC
Quantity or Concentration Units (Compliance Monitoring Activity)			Not applicable to ADEC
Value Received Date (Compliance Monitoring Activity)			Not applicable to ADEC
Value Type (Compliance Monitoring Activity)			Not applicable to ADEC
Value Qualifier (Compliance Monitoring Activity)			Not applicable to ADEC

Gap Analysis

Business Processes

Compliance monitoring inspections will soon be submitted to ICIS-NPDES electronically through the new data flow, which will satisfy the eReporting Rule requirements. No additional business process changes will be required for this payload category.

Detailed Compliance Monitoring Data Elements

The eReporting Rule requires a number of additional data elements be submitted for inspections of facilities with CAFO and pretreatment permits, but these are not applicable to ADEC business practices.

Violations and Enforcement Actions

Business Processes

Once an inspection has been entered into DROPS, the enforcement officer will determine whether informal or formal enforcement is required. Any informal or formal enforcement actions are then entered into DROPS, although, in many cases (especially for formal actions) this may not occur until after the action has been completed. For example, an action is taken against the facility, an agreement is reached between ADEC and the facility, and the final agreement is signed by the ADEC Director and the facility, and only then is information entered into DROPS.

Violations are recorded in DROPS as "enforcement items" as part of the enforcement action along with any corrective actions that are required (schedule of compliance). DROPS does provide a specific

violation management module as part of the inspection tracking components but ADEC does not currently use this functionality. Enforcement items (violations) can be linked to the relevant inspection records.

As corrective actions are completed, the schedule items in DROPS are closed out. For informal actions, the final compliance achieved date is recorded, while formal actions are closed. The violations or enforcement items associated with the enforcement action will be resolved as the action is closed, unless the violation is of an effluent limit.

Any penalty requirements are also tracked in DROPS as scheduled items which are updated as payments are received, although there is currently no place in DROPS to store the actual penalty amounts, either assessed or received.

DROPS supports superseding of enforcement actions, but once an action is superseded, the compliance schedules associated with it are automatically resolved in DROPS with the assumption that any outstanding schedule items will be moved to the new action.

Enforcement actions are currently entered manually into ICIS-NPDES. In practice, enforcement actions are often not entered into ICIS-NPDES until they are complete and so formal actions are often issued and closed on the same day. The new automated data flow to ICIS-NPDES will replace the current manual data entry process for informal enforcement actions only.

When entering enforcement actions into ICIS-NPDES, the associated violations are also entered manually based on the enforcement items recorded in DROPS. The Single Event Violation (SEV) codes required by ICIS-NPDES are derived directly from the inspection reports.

Data Management

DROPS supports the management of some of the information required by the eReporting Rule for enforcement actions, but not currently any of the information required for violations.

The following table details the data elements required to be collected and reported by the eReporting Rule and indicates whether these elements are or will be supported by DROPS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Information Common to Violations, Enforcement Actions, and Final Orders			
Violation Code		X	
Violation Date		X	
Violation Information			
Agency Identifying the Single Event Violation (SEV)			Will be derived by data flow to ICIS
Single Event Violation Start Date		X	
Single Event Violation End Date		X	
RNC Detection Code		X	
RNC Detection Date		X	
RNC Resolution Code		X	
RNC Resolution Date		X	
Enforcement Action Information			
Enforcement Action Identifier	X		

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Enforcement Action Forum			Will be derived by data flow to ICIS
Enforcement Action Type	X		
Programs Violated (Enforcement Action)			Will be derived by data flow to ICIS
Enforcement Action Sub-activity Type			Will be derived by data flow to ICIS
Enforcement Action Sub-activity Completion Date			Will be derived by data flow to ICIS
Final Order Information			
Final Order Identifier			Will be derived by data flow to ICIS
Final Order Type		X	
Final Order Issued/ Entered Date	X		
NPDES Closed Date	X		
Penalty Information			
Penalty Amount Assessed		X	
Penalty Amount Collected		X	
Supplemental Environmental Project Identifier			Not applicable to ADEC
Supplemental Environmental Project Amount			Not applicable to ADEC
Supplemental Environmental Project Description			Not applicable to ADEC

Gap Analysis

Business Processes

The automated ICIS-NPDES data flow that is currently under development only supports informal enforcement action data. The automated data flow will be extended to support the single event violation, formal enforcement action and final order payload types.

Violation Data Management

DROPS does not currently track sufficient information about compliance violations to allow an automated data flow to be developed for this information. ADEC will consider alternative approaches to capturing this information in DROPS in order to support the eReporting Rule requirements. Possible alternatives include utilizing the violation data management module provided by DROPS but not currently used, or extending the existing inspection data management module to capture the minimal information required by the eReporting Rule including the SEV codes.

Enhancing the violation data management capabilities in DROPS will also allow ADEC to automate the submission of violation-to-inspection linkages and violation-to-enforcement action linkages.

Penalty Data Management

DROPS does not currently support the management of enforcement penalties. To support the eReporting Rule requirement for this information, additional fields will be added to DROPS.

Permit Conditions and Compliance Schedules

Business Processes

DROPS is currently used to track compliance schedules for enforcement actions. The same module in DROPS also has the capability to track specific permit conditions. In the past this feature had been disabled, but it was recently re-enabled as part of the ICIS-NPDES batch flow effort. The list of available narrative conditions in DROPS are aligned with the acceptable values for ICIS-NPDES. As new permits are issued, the permit writer will be able to select from the available narrative conditions for the permit.

Narrative permit conditions are currently entered manually into ICIS-NPDES once a permit is issued, in order to support violation reports. Enforcement compliance schedules are not typically entered into ICIS-NPDES for enforcement actions, since most formal enforcement actions are settlement agreements rather than having compliance schedules.

Data Management

DROPS supports the management of much of the information required by the eReporting Rule for permit conditions and compliance schedules.

The following table details the data elements required to be collected and reported by the eReporting Rule and indicates whether these elements are or will be supported by DROPS.

Data Element Name	Element in DROPS	Element to be added to DROPS	Notes
Narrative Conditions and Permit Schedules Information			
Permit Narrative Condition Code	X		
Permit Narrative Condition Number	X		
Permit Schedule Date	X		
Permit Schedule Actual Date	X		
Required Report Received Date	X		
Permit Schedule Event Code	X		
Compliance Schedule Information			
Compliance Schedule Number			Will be derived by data flow to ICIS
Compliance Schedule Type			Will be derived by data flow to ICIS
Compliance Schedule Description	X		
Compliance Schedule Event Code			Will be derived by data flow to ICIS
Compliance Schedule Due Date	X		
Compliance Schedule Actual Date	X		
Compliance Schedule Report Received Date	X		

Gap Analysis

Business Processes

The automated ICIS-NPDES data flow that is currently under development already supports permit narrative conditions. The automated data flow will be extended to enforcement compliance schedules.

Summary

With the implementation of the new eReporting Rule, EPA will require ADEC to make changes to information systems and business practices in order to meet the new reporting requirements, including supporting additional data elements, providing electronic reporting capabilities, and enhancing data submissions to the national ICIS-NPDES system.

The purpose of this project is to assess DOW's readiness for compliance with the requirements of the eReporting Rule by considering the business process and data management changes needed across the different categories of information encompassed by the eReporting Rule.

Individual Permits and Components

The eReporting Rule does not mandate electronic collection of individual permit applications from the regulated community and ADEC's current business processes related to the collection of individual permit information are compliant with the eReporting Rule.

ADEC will soon begin submitting data to ICIS-NPDES electronically, satisfying many of the eReporting Rule requirements for data reporting to ICIS-NPDES, although some changes will be necessary to the automated data flow to better support the individual data element reporting requirements of the eReporting Rule. ADEC will continue to provide much of the less common individual permit data to ICIS-NPDES manually.

General Permits and Components

The OASys system already provides the functionality required to satisfy the eReporting Rule requirement for electronic collection of general permit applications. Many general permit applications are already being received by OASys, and although not all permit types are supported today, ADEC has plans to enable electronic form submissions for the majority of the remaining general permit types by 2020.

As with individual permits, general permit coverages will soon be submitted to ICIS-NPDES electronically through the new data flow, which will satisfy many of the eReporting Rule requirements, although some changes will again be necessary. The automated data flow will be extended to include all general permit coverages in the scope of the data submission, and to better support detailed general permit component information.

Parameter Limits, Limit Sets, and Permitted Features

Permitted features, limit sets, and parameter limits will soon be submitted to ICIS-NPDES electronically through the automated data flow, satisfying many of the eReporting Rule requirements. The data flow will need to be extended to include certain data elements which are required by the eReporting Rule but not currently supported.

Program Reports

The OASys system already supports submission of the Stormwater Industrial Permit Annual Report electronically. To meet the eReporting Rule requirement that all program compliance reports be received electronically by 2020, additional electronic report forms will be added to OASys, possibly using a standard submission form which will capture the basic report details and attached PDF files containing the report details.

The automated data flow will be extended to support the submission of Stormwater Industrial Permit Annual Report receipts to ICIS-NPDES. Information about other types of program compliance report required by the eReporting Rule will be manually entered into ICIS-NPDES by ADEC.

Discharge Monitoring Reports

ADEC is currently in the process of implementing the EPA-provided NetDMR system to meet the eReporting Rule requirements for electronic collection of DMR data and submission to ICIS-NPDES.

Compliance Monitoring Activities and Components

Compliance monitoring inspections will soon be submitted to ICIS-NPDES electronically through the new data flow, which will satisfy the eReporting Rule requirements for this category of information.

Violations and Enforcement Actions

The automated ICIS-NPDES data flow will be extended to support the single event violation, formal enforcement action and final order payload types, in addition to the informal enforcement actions which are already supported.

In addition, DROPS will be modified to allow an automated data flow to be developed for compliance violation information. ADEC will consider alternative approaches to capturing this information in DROPS in order to support the eReporting Rule requirements.

Permit Conditions and Compliance Schedules

The automated ICIS-NPDES data flow that is currently under development already supports permit narrative conditions. The automated data flow will be extended to support enforcement compliance schedules.

Appendix A – Payload Categories

The following table lists the categories that will be used to relate the ICIS-NPDES payload types or data families during this assessment project, and indicates how the data submission requirements of the eReporting Rule will be supported.

Automated data flow to ICIS-NPDES	These payloads will be supported by the ICIS-NPDES automated data flow over the Exchange Network. DROPS will be the system of record for all data to be shared for these payloads.
Manual data entry into ICIS-NPDES	These payloads contain data that will continue to be managed by ADEC through direct entry of information into ICIS-NPDES.
Use of NetDMR	The DMR payload types will eventually be supported by using NetDMR. Until NetDMR is in place, ADEC will enter data directly into ICIS.
Not applicable	These payload types contain data for programs not implemented by ADEC either currently or foreseen within the eReporting Rule timeframe.

Category	Payload Type	eReporting Rule Support
Permits	Basic Permit	Automated data flow
Permits	General Permit	Automated data flow
Permits	Historical Permit Schedule Events	Not applicable
Permits	Master General Permit	Automated data flow
Permits	Narrative Condition Schedule	Automated data flow
Permits	Permit Reissuance	Automated data flow
Permits	Permit Termination	Automated data flow
Permits	Permit Tracking Event	Not applicable
Permits	Unpermitted Facility	Automated data flow
Permit Components	Biosolids Permit	Not applicable
Permit Components	CAFO Permit	Not applicable
Permit Components	CSO Permit	Manual data entry
Permit Components	Effluent Trade Partner	Not applicable
Permit Components	POTW Permit	Automated data flow
Permit Components	Pretreatment Permit	Manual data entry
Permit Components	SW Construction Permit	Automated data flow
Permit Components	SW Industrial Permit	Automated data flow
Permit Components	SW MS4 Large Permit	Manual data entry
Permit Components	SW MS4 Small Permit	Manual data entry
Parameter Limits, Limit Sets and Permitted Features	Copy MGP Limit Set	Not applicable

Category	Payload Type	eReporting Rule Support
Parameter Limits, Limit Sets and Permitted Features	Limit Set	Automated data flow
Parameter Limits, Limit Sets and Permitted Features	Limits	Not applicable
Parameter Limits, Limit Sets and Permitted Features	Parameter Limits	Automated data flow
Parameter Limits, Limit Sets and Permitted Features	Permitted Feature	Automated data flow
Program Reports	Biosolids Program Report	Not applicable
Program Reports	CAFO Annual Report	Not applicable
Program Reports	CSO Event Report	Manual data entry
Program Reports	Local Limits Program Report	Not applicable
Program Reports	Pretreatment Performance Summary	Manual data entry
Program Reports	SSO Annual Report	Manual data entry
Program Reports	SSO Event Report	Manual data entry
Program Reports	SSO Monthly Event Report	Manual data entry
Program Reports	SW Event Report	Manual data entry
Program Reports	SW Industrial Annual Report	Automated data flow
Program Reports	SW MS4 Program Report	Manual data entry
Compliance Monitoring	Compliance Monitoring	Automated data flow
Compliance Monitoring	Compliance Monitoring Linkage	Automated data flow
Compliance Monitoring	Schedule Event Violation	Not applicable
Discharge Monitoring Reports	Discharge Monitoring Report	Use of NetDMR
Discharge Monitoring Reports	DMR Program Report Linkage	Not applicable
Discharge Monitoring Reports	DMR Violation	Use of NetDMR
Enforcement Actions	Single Event Violation	Automated data flow
Enforcement Actions	Compliance Schedule	Automated data flow
Enforcement Actions	Enforcement Action Milestone	Automated data flow
Enforcement Actions	Enforcement Action Violation Linkage	Automated data flow
Enforcement Actions	Final Order Violation Linkage	Automated data flow
Enforcement Actions	Formal Enforcement Action	Automated data flow
Enforcement Actions	Informal Enforcement Action	Automated data flow