Hawaii Department of Health, Clean Water Branch
National Pollutant Discharge Elimination System Electronic Data Reporting Implementation Plan

Version 1
December 21, 2016

Introduction

The Department of Health (DOH), Clean Water Branch (CWB), in its efforts to protect Hawaii's waters and the public, strives to optimize its production by utilizing modern information technologies. The CWB's venture into information management systems started over 5 years ago, when it built a SQL based system to house its Clean Water Act (CWA), National Pollutant Discharge Elimination System (NPDES) permits. As time passed, the CWB began outgrowing its own system as staff envisioned housing more pertinent data elements, performing data mining and analyses, automating more processes, and expanding to hold information beyond NPDES permits, like water quality monitoring data and CWA 319 program information.

In the meantime, the CWB was also collecting and analyzing NPDES monitoring and compliance data by utilizing the Environmental Protection Agency's (EPA) NetDMR system, feeding EPA's Integrated Compliance Information System (ICIS) via daily automated data flows, and running the required reports for Quarterly Non-Compliance and Significant Non-Compliance. Conveniences of EPA's systems were offset by struggles, such as ICIS updates with revised schemas that broke data flows from the state's system to ICIS, and how a mom-and-pop type regulated facility would navigate the complexity of NetDMR.

The CWB's constant evolution in information technology (IT) management experienced both a boost in purpose as well as a staggering change in course when, in 2015, the EPA promulgated the NPDES Electronic Reporting Rule (E-Reporting Rule), a regulation designed to propel states and EPA regions into the next phase of information management.

The E-Reporting Rule, situated in Title 40, Part 127 of the Code of Federal Regulations, was published on October 22, 2015 and became effective on December 21, 2015. This regulation requires the electronic reporting and sharing of NPDES program information instead of current paper-based methods. The Rule prioritizes groups of data to be electronically collected and reported into two phases; Phase 1 requires the electronic submittal of basic NPDES data and Discharge Monitoring Reports (DMRs) and Phase 2 ushers NPDES program reports into the mix. The Rule also requires that States submit an implementation plan by December 21, 2016 to discuss how and when it will meet the requirements of Phase 2.

The main hurdles in complying with the E-Reporting Rule are labor, time and money. The CWB must find financial resources for building new systems and refurbishing existing ones, manpower to work on IT developments, and manpower to conduct outreach to NPDES permit holders and applicants. Additionally, policy decisions regarding permit issuance needs to be finalized that will affect limit set coding. Quite simply, the CWB does not foresee meeting all the requirements of Phase 1 of the Rule in this first year of implementation. The lion's share of development for the CWB occurs in achieving electronic DMR submittal. However, the CWB foresees being able to meet the requirements of Phase 2 of the E-Reporting Rule with relative ease after fulfilling Phase 1 requirements and within the established five-year timeframe.

This implementation plan is owned by the DOH-CWB and describes how the agency will meet the requirements of both Phase 1 and Phase 2 of the E-Reporting Rule. While the Rule requires the states' implementation plans to cover Phase 2, the discussion of Phase 2 cannot happen alone, as the technologies that will make Phase 2 possible are also the technologies to be developed and utilized in implementing Phase 1. This plan is meant to lay out the CWB's current scheme for information technology advancement in the next 4 years, and, naturally, will evolve as projects progress. The CWB will review this plan semi-annually and will revise it as needed. The task list included in *Appendix 1* of this plan will be revised and submitted with semi-annual and annual 106 workplan reports to ensure Region 9's awareness. This Implementation Plan will be used by the CWB for its own understanding and guidance, as well as by the EPA for assessing Hawaii's plans to meet the E-reporting Rule requirements.

Roles and Responsibilities

IT management at the CWB affects all staffers, and not just those working specifically on NPDES permits; therefore, it is guided by the various section supervisors (Monitoring, Non-Point Source Control, Permitting, Enforcement) and the NPDES Data Manager and ultimately directed by the CWB Chief.

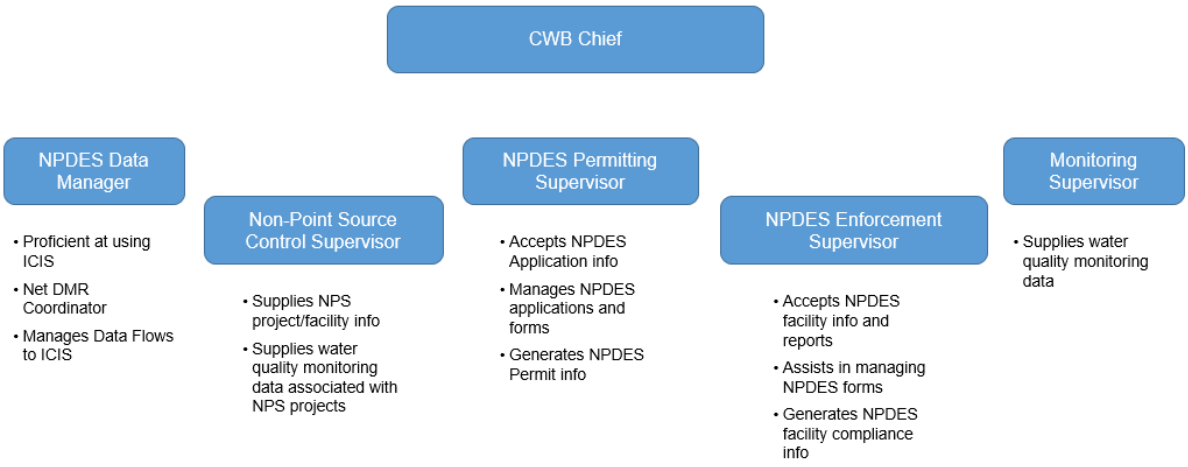

Figure 1. CWB Information Technology Management Team

At this time, the NPDES Data Manager is a staff member from the Enforcement Section who is the sole CWB staff member that is proficient in using EPA's Integrated Compliance Information System (ICIS) and NetDMR, and has also worked on the development of data flows and data management systems. The Enforcement staff member also has compliance monitoring duties in addition to NPDES data management.

The supervisors will need to represent the IT needs of its section, and will also need to allocate manpower to be a part of IT development.

As of December 2016, the IT team consists of the following staff members:

CWB Chief: Alec Wong
NPDES Data Manager: Scott Miyashiro
Non-Point Source Control Supervisor: Michael Burke
NPDES Permitting Supervisor: Darryl Lum
Enforcement Supervisor: Matthew Kurano
Monitoring Supervisor: Watson Okubo

Current Capabilities and Phase 1 Compliance Projections

In a nutshell, to achieve full compliance with Phase 1 of the Rule, the CWB must:

- Collect, store, and transmit the remaining data elements discussed previously; and
- Develop a simple way for permit holders to submit DMRs.

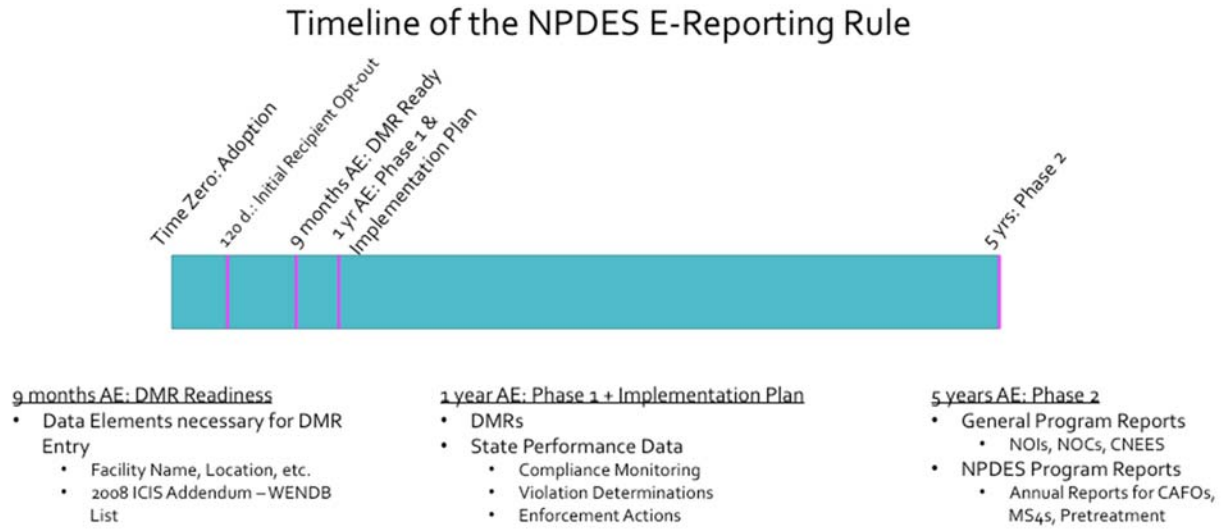

Figure 2. Timeline of the NPDES E-Reporting Rule requirements

Four (4) major milestones after adoption exist within the Rule: Initial Recipient declaration at 120 Days, DMR Readiness at 9 months, Basic NPDES data and DMRs at Year 1, and Program Reports at Year 5. Phase 1 encompasses the first 3 milestones.

The CWB has decided to remain the Initial Recipient of NPDES data to ensure that permittees have consistent interaction with the State as a regulatory agency.

The CWB is already utilizing information management systems and continues to advance in its data management efforts; however, the CWB projects that it will not be in full compliance with E-Reporting Rule requirements for Phase 1 by December 21, 2016.

Universe
The NPDES universe in Hawaii consists of 19 Major permits, 28 Traditional Non-Major permits, and approximately 1,136 facilities covered under one of Hawaii's 12 General Permits. All permits and Notices of General Permit Coverage issued by the CWB are currently being

reported to ICIS through automated data flows. These flows include many elements of basic facility data, like location, owner, and contact information.

Data Storage
At this time, the CWB utilizes a system called Water Pollution Control, or WPC, to house NPDES permit data, compliance monitoring activity information, some limit sets and limits, enforcement actions, sanitary sewer overflow records, and complaints. However, WPC was made over 5 years ago and doesn't house all data elements the Rule addresses.

Since Phase 1 requires electronic submittal of DMRs, the ICIS Addendum, or WENDB list, has been referenced as the data elements necessary for DMR readiness. The WENDB list names 187 data elements that are needed for reporting; WPC currently houses 102 of the elements, but doesn't yet house 80. Five elements don't apply to the CWB's program.

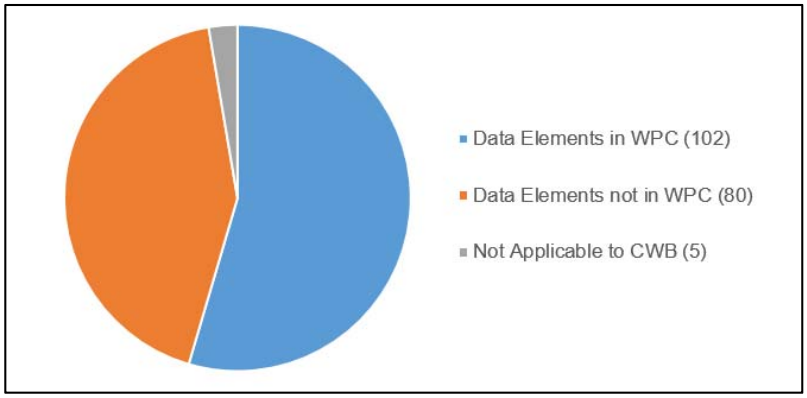

Figure 3. Data Elements necessary for Phase 1 that are stored in WPC

Limit set and limits are vital parts of DMR readiness, but at present, WPC is used sparingly to house limit set information. When building WPC, limited funding prevented the development of a user-friendly tool to build limit sets; thus, the NPDES Data Manager codes most Major and Traditional Non-Major permits manually in ICIS.

Data Collection
The CWB has the ability to collect data with a system called the E-Permitting Portal. The Portal allows the agency to design and publish data collection forms, and the CWB already uses it to collect NPDES applications, Notices of Intent, and basic submittals of compliance information. The agency can create, revise, and publish forms without reliance on a contractor.

While the E-Permitting Portal boasts great flexibility in form publishing, it is mired by internal approvals. The Portal is owned by the CWB's parent agency, the DOH, Environmental Health Administration, and is utilized by other branches. Therefore, major decisions regarding its management requires buy-in from managers outside of the CWB and can be difficult. The Portal has approval to accept data electronically under the Cross Media Electronic Reporting Rule (CROMERR), but the CWB and the DOH Environmental Management Division have not yet implemented a procedure by which permit holders or applicants can use electronic signatures. This process is under development and will be rolled out to the public in the first half of 2017.

The CWB is currently working on a gap analysis of data elements required by Phase 1 versus what we collect, store, and transmit. While the gap analysis is not yet complete, it is estimated that the CWB still needs to electronically collect 41 basic facility and permit data elements from

the permit applicant through a form on the E-Permitting Portal. These elements can be added by revising the current Notices of Intent or NPDES Applications.

It must be noted that a major limitation exists in that there is no connection between the Portal and WPC. While the CWB can electronically collect data through the E-Permitting Portal, that collection is incomplete, as data accepted through the Portal must be manually entered into WPC. A project to connect the E-Permitting Portal and WPC is envisioned, but has not yet been initiated and may also be strategically delayed until a major overhaul or redevelopment of WPC is also underway.

Transmission

Data flows have been created to transmit many data elements from WPC to ICIS. These flows are refreshed daily, but are complex and have been damaged after ICIS schema revisions. In fact, at this moment, after the release of ICIS Version 7.5 in mid-December of 2016, the CWB's flows are currently suspended! Under normal circumstances, a number of data elements within the Rule are already being flowed from WPC to ICIS, although these flows were built before the E-Reporting Rule was drafted and don't address all the elements required in Phase 1. Within the WENDB list, 98 elements are flowed from WPC to ICIS, while 73 elements are not flowed, 11 elements are manually entered, and 5 are not applicable to the CWB's program.

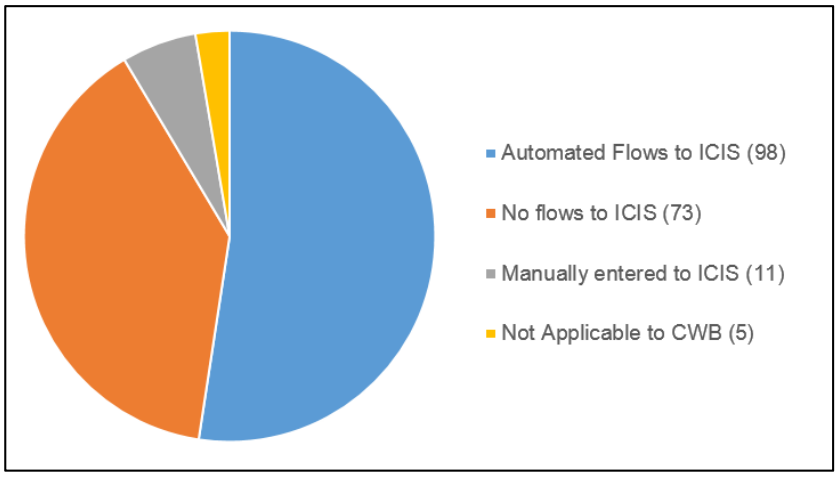

Figure 4. Data elements from WENDB list that are flowed, manually entered, or not sent/flowed to ICIS

In counting elements in the first eleven sections of Appendix A of the Rule (i.e. Basic Facility Information, Basic Permit information, etc.), the CWB flows 61 data elements, does not have flows for 65 elements, needs to revise 1 flow, and does not need to flow 2 elements.

Much like the development of a connection between the E-Permitting Portal and WPC, the CWB believes that new flows will likely be built around the same time WPC is redeveloped.

DMR Collection and Transmission

Up to this point in time, efforts to collect DMRs electronically through NetDMR have been focused on NPDES Major permitted facilities, with an incorporation of traditional Non-Major permitted facilities when possible. This was always the direction established in the 106 work grant, and was also achievable with limited manpower.

Table 1. List of Hawaii NPDES Major and Traditional Non-Major permits with limit and reporting statistics

	Active or Admin Extended	Permits currently contested	Limits Coded into ICIS	Reporting with NetDMR	Signed up on NetDMR
Majors	19	6	13	9	14
Traditional Non-Majors	28	1	23	11	11

There are 19 Major permit holders in Hawaii, however, 2 are MS4s whose limits on industrial storm water discharges are in question and permit contests currently being disputed have prevented coding of 4 more facilities. Of the 13 Major permits with limits coded, 10 are reporting through NetDMR, 1 more is expected to begin reporting in December 2016, 1 is signed up to use NetDMR, and 1 is slated to sign up in January of 2017. There are 28 traditional Non-Major permit holders in Hawaii; despite permit contests, all limits have been coded into ICIS. Eleven traditional non-major permit holders are signed up and reporting through NetDMR.

A retired CWB staff member volunteers one day per week and provides assistance in manual entry of DMR data to ICIS. The volunteer enters data for all Major and Traditional Non-Major facilities not reporting through NetDMR whose limits could be coded into ICIS.

Phase 1 of the E-Reporting Rule also requires the electronic submittal and sharing of DMR data for all other Non-Major permits, such as General Permits. The CWB has only coded limits for a handful of general permit covered facilities at the request of the Hawaii Department of Transportation, who wanted to start utilizing NetDMR. The table below summarizes the breadth of general permits and general permit covered facilities whose limits need to be coded into ICIS before electronic DMR reporting can occur.

Table 2. List of General Permits that have limit sets, and how many covered facilities have limit sets coded into ICIS and are signed up on NetDMR

	Limits Coded into ICIS	Signed up with NetDMR
Industrial Storm Water General Permit	4 of 162	0
Leaking Underground Storage Tank General Permit	0 of 1	0
Once Through Cooling Water (less than 1 MGD) General Permit	0 of 2	0
Hydrotesting General Permit	1 of 47	1
Dewatering General Permit	4 of 28	3
Petroleum Bulk Stations Process Wastewater General Permit	0 of 1	0
Decorative Ponds General Permit	0 of 10	0

Remaining Tasks to Fully Comply with Phase 1
In summary, addressing the remaining data elements entails:

- Completing an ongoing gap analysis for remaining Core NPDES Permitting, Compliance and Enforcement data elements that need collection, storage, and transmittal;
- Completing tasks to electronically collect Phase 1 data elements (Develop and implement electronic signatures program, revise or create E-Permitting forms, etc.);
- Completing tasks to store all necessary elements in WPC or similar data storage system (building spots in WPC or building a new system);
- Completing tasks to transmit data from the state system to ICIS;
- Completing tasks to get Individual and General Permit limit sets into the state system and coded into ICIS; and
- Collect DMR data from all permit holders electronically, through either NetDMR or a state data collection system.

While the list above is summarized to simplify reading, the magnitude of these tasks cannot be trivialized. For example, the task of getting limit sets into a state system and ICIS actually includes subtasks like coding in limit sets, building global limit sets within our current state system, and, in the future, constructing with a contractor a limit set building tool that connects with our state system that will allow permit writers to create limit sets that push into the permit, the state system, and ultimately ICIS.

A full list of tasks and subtasks that must be accomplished to comply with Phase 1 are summarized in *Appendix 1* of this Implementation Plan.

Hurdles
The hurdles involved with completing Phase 1 tasks are funding, manpower, and ironing out internal policies. Funding is self-explanatory: to build data systems and flows, it takes time and money.

Manpower is particularly demanding, as the vast majority of E-Reporting related tasks are outside the normal duties of any CWB staff member. Further, to accomplish these tasks, staff members need a basic foundation of knowledge regarding NPDES permitting and enforcement, ICIS, NetDMR, and data transfers through EPA's Exchange Network. Manpower will be needed to perform gap analyses, develop E-Permitting forms, work with contractors to redevelop WPC, work with contractors on building new data flows as well as updating old ones to accommodate changing ICIS schema, get limit sets to ICIS or WPC for Major and Non-Major permits (including a wide variety of General Permits), work with a contractor on a limit set building tool, perform outreach to permit holders on electronic signatures, NetDMR, and/or a state built DMR system, and be available for trouble shooting when permit holders are submitting E-Permitting forms and DMRs.

Lastly, difficulties with contested permits or policies regarding general permit limit sets have stymied the coding of limits in ICIS. To get coding back on track for these permits, these issues must be ironed out.

Updates to State Statutes or Regulations
The CWB has already promulgated necessary revisions to its regulations, the Hawaii Administrative Rules, Chapter 11-55, to require electronic data submittal and enable use of electronic signatures. The CWB has also revised Chapter 11-55 to allow for permit modifications

to accommodate and require electronic data submittals. At this point in time, there are no further regulatory revisions expected.

It should be noted that there are necessary policy decisions that must be made regarding assigning limits to General Permits. At this time, limit sets can vary based on facility, rather than having a standard set per discharge or effluent type. This makes limit set coding different per facility covered under a General Permit, whereas standardized limit sets based on discharge type would allow for use of Global Limit Sets or functions like copying limit sets to make coding faster.

Projections to Comply with Phase 2 of the E-Reporting Rule

Phase 2 of the E-Reporting Rule requires program reports to be submitted electronically, which in turn requires the CWB to have a system to store the data and flows to transmit the data to ICIS. The program reports are listed below.

Table 3. List of Program Reports required to be submitted electronically by the E-Reporting Rule

Data Group	Program Reports
2	General Permit Reports *Notices of Intent, Notices of Cessation, No Exposure Certificates, etc.*
5	Concentrated Animal Feeding Operation Annual Program Reports
6	Municipal Separate Storm Sewer System Program Reports
7	Pretreatment Program Reports
9	Sewer Overflow Event Reports
10	CWA Section 316(b) Annual Reports

It is expected that many of the tasks the CWB will complete to comply with Phase 1 of the Rule will catapult the CWB into accomplishing the tasks necessary to comply with Phase 2. Data systems and flows will largely be in place.

The following key tasks will have already been tackled for Phase 1 of the Rule.

- The CWB already has the ability to collect report data through the E-Permitting Portal, which has CROMERR approval and flexible form creation options.
- The CWB and the DOH Environmental Management Division will adopt and implement an electronic signatures policy to allow permit holders to provide annual report information through the E-Permitting Portal.
- By October 1, 2017, it is expected that the E-Permitting Portal will also connect to WPC, or whatever data storage system the CWB will develop.
- The CWB will develop a data storage system that will house fields for the data collected in the various program reports.

The main tasks that will remain for Phase 2 can be summarized as:

- Developing specific forms to collect program report data;
- Building spots in the CWB's data system to house these elements; and
- Building flows from the CWB's data system to ICIS.

The tasks and subtasks that must be accomplished to comply with Phase 2 of the E-Reporting Rule are summarized in *Appendix 1* of this Implementation Plan. Note that the list of tasks for Phase 2 is significantly lighter than the task list for Phase 1.

Hurdles
These tasks will require funding, manpower, and work with a contractor.

It should also be noted that the progression of Phase 2 will be heavily dependent on the EPA. Many of the program report data elements do not yet have "spots" in ICIS, and pre-set options for certain elements have not yet been defined. All states will have to wait to develop data systems and flows until the pre-set options and the details of the ICIS schemas are developed and released by the EPA. The CWB will develop flows between its WPC/data storage system and ICIS for program report data elements. Since many of these data elements do not yet have fields in ICIS, this task will depend on the EPA's actions to update ICIS. ICIS schema will dictate how the flows are created. This timeline will depend heavily on EPA's schedule, and the CWB will have to tackle the additional difficulty of managing funds to achieve tasks on someone else's timeline.

Summary

In conclusion, the CWB foresees belated achievement of compliance with Phase 1 of the E-Reporting Rule, followed by timely compliance with Phase 2. The major hurdles facing the CWB are funding and manpower. Funding must be obtained for building data systems or upgrading existing ones and manpower. Manpower needs are daunting and substantial. IT development must be performed by existing staff with institutional knowledge, but that staff will have to carve time out of their regular duties. Further, even fewer staff members are adept at outreach, and those staff members will be tapped to spearhead significant outreach campaigns, also in addition to normal duties. Lastly, manpower also has a price tag.

The silver lining to the daunting task of complying with the E-Reporting Rule is that improved IT systems and processes will have numerous benefits:

- Decreasing volumes of wasteful paper based submittals;
- Standardizing NPDES data obtained from the regulated community;
- Improved branch function and unity with a comprehensive system that goes beyond NPDES permits;
- Efficient data collection from permit holders;
- Improved work efficiency by automating processes, such as limit set building and eliminating the need for manual data entry by CWB staff; and
- The ability to perform data mining to guide policy decisions and planning.

Appendix 1: Task and Subtask List for Full Compliance with Phases 1 and 2 of the NPDES E-Reporting Rule

December 21, 2016

Task: Transfer all NPDES Program data that supports electronic reporting (e.g. facility info, permit info like permitted features, narrative conditions) to EPA

Date Required by E-Reporting Rule: September 21, 2016

Subtask: Electronically collect NPDES program data from Permittees

Date required by E-Reporting Rule: 9/21/2016

Projected Date of Completion: 8/30/2017 Months over deadline: 11

Phase		Data Group		% Complete	Timeline	Obstacles
1	Analysis to determine basic facility data elements that are not yet collected from permittee via E-Permitting form	1, 2, 5, 6, 7, 10	CWB Enforcement & Permitting	75	3/31/2017	Manpower outside of normal work duties
1	Revise forms in E-Permitting to collect basic facility data (#) not yet collected or collect in same manner as E-Reporting	2, 5, 6, 7, 10	CWB Enforcement & Permitting		6/30/2017	Manpower outside of normal work duties
1	Develop forms in E-Permitting to collect basic facility data (#) not collected at all	2, 5, 6, 7, 10	CWB Enforcement & Permitting	0	6/30/2017	Manpower outside of normal work duties
1	Develop and get internal approval for Electronic Signatures Program, roll out Electronic Signatures Program	2, 5, 6, 7, 10	CWB	5	6/30/2017	Manpower outside of norma work duties, Getting internal approvals
1	Perform outreach and implement Electronic Signatures Program	2, 5, 6, 7, 10	CWB Enforcement & Permitting	0	8/30/2017	Manpower outside of normal work duties
1	Build a connection between E-Permitting and WPC to get collected data to the storage system	1, 2, 5, 6, 7, 10	CWB Enforcement & Permitting	0	10/1/2017	Manpower outside of normal work duties

Subtask: Electronically store NDPES program data collected from Permittees and NPDES program data generated by CWB

Date required by E-Reporting Rule: 9/21/2016

Projected Date of Completion: 10/1/2017 Months over deadline: 12

Phase		Data Group		% Complete	Timeline	Obstacles
1	Analysis to determine data elements (basic facility, compliance/enf) that do not have a "spot" in WPC	1, 2, 5, 6, 7, 9, 10	CWB Enforcement & Permitting	75	3/31/2017	Manpower outside of normal work duties
1	Build places for data elements (basic facility, compliance/enf) that do not yet have a spot in WPC	1, 2, 5, 6, 7, 9, 10	CWB + Contractor	0	10/1/2017	Funding, Manpower for IT project
1	Analysis to determine data elements (basic facility, compliance/enf) not yet flowed between WPC and ICIS	1, 2, 3, 5, 6, 7, 9, 10	CWB Enforcement	75	3/31/2017	Manpower outside of normal work duties
1	Build or revise flows (basic facility, compliance/enf) that don't yet exist or need to be fixed/enhanced	1, 2, 3, 5, 6, 7, 9, 10	CWB Enforcement + Contractor	0	10/1/2017	Funding, Manpower for IT project

Subtask: Transfer all NPDES Program data for Major and Traditional Non-Major permits that supports electronic reporting (specifically Limit sets, Limits, etc generated by CWB) to EPA

Date required by E-Reporting Rule: 9/21/2016

Projected Date of Completion: 10/1/2017 Months over deadline: 12

Phase		Data Group		% Complete	Timeline	Obstacles
1	Analysis to determine limits data elements that do not have a "spot" in WPC	1, 3	CWB Enforcement & Permitting	75	3/31/2017	Manpower outside of normal work duties
1	Build places for limits data elements that do not yet have a spot in WPC	1, 3	CWB + Contractor	0	10/1/2017	Funding, Manpower for IT project
1	Analysis to determine limits data elements not yet flowed between WPC and ICIS	1, 3	CWB Enforcement	75	3/31/2017	Manpower outside of normal work duties
1	Build or revise flows (limits, limit sets, etc) that don't yet exist or need to be fixed/enhanced	1, 3	CWB Enforcement	0	10/1/2017	Funding, Manpower for IT project
1	Code all Major NPDES permits limit sets	1, 3	CWB Enforcement	100	12/21/2016	Excludes contested permits
1	Code all Traditional Non-Major permits limit sets	1, 3	CWB Enforcement	75	9/30/2017	Internal policy on MS4 monitoring requirements

Subtask: Transfer all NPDES Program data for Non-Major permits (i.e. industrial storm water, hydrotesting, dewatering, etc.) that supports electronic reporting (specifically Limit sets, Limits, etc generated by CWB) to EPA

Date required by E-Reporting Rule: 9/21/2016

Projected Date of Completion: 12/31/2018 Months over deadline: 27

Phase		Data Group		% Complete	Timeline	Obstacles
1	Build monitoring data storage system to house and collect numerical samp data (both NPDES compliance monitoring data and overall water quality monitoring data)	3	CWB + Contractor	0	10/1/2018	Funding, Manpower for IT project
1	Obtain CROMERR for CWB monitoring data system	3	CWB + Contractor	0	12/31/2018	Funding, Manpower for IT project
1	Build limit set builder in WPC that interacts with monitoring data storage system	3	CWB + Contractor	0	10/1/2018	Funding, Manpower for IT project
1	Build flows between CWB monitoring data system and Next Gen WPC and ICIS	3	CWB Enforcement + Contractor	0	10/1/2018	Funding, Manpower for IT project
1	Code all General Permit master limit sets in the Limit Set Builder, apply to covered facilities	GP 3	CWB Enforcement & Permitting + Contractor	10	12/31/2018	Funding, Manpower for IT project, Internal policy on GP limit sets

Task: Collect Discharge Monitoring Reports Electronically

Date Required by E-Reporting Rule: December 21, 2016

Subtask: Collect, store, and transmit to EPA DMRs from Major Permit holders electronically

Date required by E-Reporting Rule: 12/21/2016

Projected Date of Completion: 6/30/2017 Months over deadline: 6

Phase		Data Group		% Complete	Timeline	Obstacles
1	Outreach and sign up all Major NPDES permit holders on Net DMR	3	CWB Enforcement & Permitting	70	6/30/2017	Manpower outside of normal work duties, contested permits

Subtask: Collect, store, and transmit to EPA DMRs from Traditional Non-Major Permit holders electronically

Date required by E-Reporting Rule: 12/21/2016

Projected Date of Completion: 6/30/2017 Months over deadline: 6

Phase		Data Group		% Complete	Timeline	Obstacles
1	Outreach and sign up all Traditional Non-Major permit holders on Net DMR	3	CWB Enforcement & Permitting	80	6/30/2017	Manpower outside of normal work duties

Subtask: Electronically collect, store, and transmit to EPA DMRs from Non-Major Permit holders (Industrial storm water, hydrotesting, dewatering, decorative ponds, etc.)

Date required by E-Reporting Rule: 12/21/2016

Projected Date of Completion: 12/31/2019 Months over deadline: 36

Phase		Data Group		% Complete	Timeline	Obstacles
1	Outreach to train large # of permittees in a wide variety of industries on submitting data to CWB monitoring data system	3	CWB Enforcement & Permitting	0	12/31/2019	Manpower outside of normal work duties

Task: Collect, Store, and Transmit NPDES Program Reports electronically (Data Groups 2, 5, 6, 7, 9, 10 - e.g. General Permit Reports, CAFO Annual Program Report, MS4 Annual Program Report, etc.)

Date required by E-Reporting Rule: 12/21/2020

Subtask: Electronically collect, store, and transmit NDPES program reports from Permittees

Date required by E-Reporting Rule: 12/21/2020

Projected Date of Completion: 12/21/2020 Months over deadline: 0

Phase		Data Group		% Complete	Timeline	Obstacles
2	Analysis to determine data elements (General Permit Reports, Progr Reports, SSO Reports) that are not yet collected; determine what can be collected through E-Permitting Portal	1, 2, 5, 6, 7, 10	CWB Enforcement & Permitting	75	3/31/2017	Manpower outside of normal work duties
2	Revise forms in E-Permitting to collect (General Permit Reports, Program Reports, SSO Reports) data (#) not yet collected or collect in same manne E-Reporting	2, 5, 6, 7, 10	CWB Enforcement & Permitting		12/21/2020	Manpower outside of normal work duties, Need to wait for IC schemas & further definition of data elements
2	Develop forms in E-Permitting to collect (General Permit Reports, Program Reports, SSO Reports) data (#) not collected at all	2, 5, 6, 7, 10	CWB Enforcement & Permitting	0	12/21/2020	Manpower outside of normal work duties, Need to wait for IC schemas & further definition of data elements
2	Develop and get internal approval for Electronic Signatures Program	2, 5, 6, 7, 10	CWB	5	6/30/2017	Manpower outside of normal work duties
2	Perform outreach to roll out Electronic Signatures Program	2, 5, 6, 7, 10	CWB Enforcement & Permitting	0	8/30/2017	Manpower outside of normal work duties
2	Analysis to determine data elements (General Permit Reports, Program Reports, SSO Reports) that do not have a "spot" in WPC	1, 2, 5, 6, 7, 9, 10	CWB Enforcement & Permitting	75	3/31/2017	Manpower outside of normal work duties
2	Build places for data elements (General Permit Reports, Program Reports, SSO Reports) that do not yet have a spot in WPC	1, 2, 5, 6, 7, 9, 10	CWB + Contractor	0	12/21/2020	Manpower outside of normal work duties, Need to wait for IC schemas & further definition of
2	Analysis to determine data elements (General Permit Reports, Program Reports, SSO Reports) not yet flowed between WPC and ICIS	1, 2, 3, 5, 6, 7, 9, 10	CWB Enforcement	75	3/31/2017	Manpower outside of normal work duties
2	Build or revise flows (General Permit Reports, Program Reports, SSO Reports) that don't yet exist or need to be fixed/enhanced	1, 2, 3, 5, 6, 7, 9, 10	CWB Enforcement	0	12/21/2020	Manpower outside of normal work duties, Need to wait for IC schemas & further definition of data elements