NPDES Electronic Reporting Rule
Phase 2 Implementation Plan
Washington Department of Ecology | Updated October 2017

Implementation Plan Purpose

On October 22, 2015, EPA published the final National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule. This regulation requires the electronic reporting and sharing of Clean Water Act NPDES program information instead of the current paper-based reporting of this information.

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

In accordance with the final rule [40 CFR 127.26(h)], authorized NPDES programs must submit an Implementation Plan (IP) to EPA by December 21, 2016, for EPA's review. This document constitutes the IP for the Washington State Department of Ecology (Ecology)[1].

EPA will inform the authorized NPDES program if the implementation plan has enough detail to ensure successful implementation of electronic reporting for Phase 2 data. Completed IPs can be emailed to EPA using the following email address: NPDESElectronicReporting@epa.gov.

Overview/Executive Summary

Data Systems
Permitting and Reporting Information System (PARIS)
PARIS (https://fortress.wa.gov/ecy/wqreports/public/f?p=110:1:2267007221517172:::300) is the central database application that stores all of the permit information tracked electronically by Ecology. The current version of PARIS was developed in Oracle. Ecology is standardizing on a Microsoft framework, and is currently in the process of redeveloping PARIS into a .NET/SQL Server application. The version of PARIS under development is commonly referred to as PARIS 3.0.

PARIS tracks the following data:

- Basic permit data

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[1] Original version submitted to EPA October 2016

- Narrative conditions
- Inspections
- Enforcement actions
- Permit Features
- Limits and Limit Sets
- DMR submittals
- DMR data
- Violations
- No Exposure Certifications
- Low Erosivity Waivers

The current anticipated completion date for PARIS 3.0 is December of 2017.

WQWebPortal

Ecology provides permittees with the means to submit applications, notices of termination, waiver requests, permit submittals, and DMRs online through an application called WQWebPortal, or Portal (http://www.ecy.wa.gov/programs/wq/permits/paris/portal.html). This .NET/SQL Server application is being actively maintained, and will be closely linked with the redeveloped PARIS 3.0. It includes basic user authentication through a statewide services called Secure Access Washington for the application/NOI, NOT, and waiver functions. It also provides CROMERR-compliant signature account authentication for permit submittals and DMRs.

WQWebPortal accepts applications for coverage for six general permits:

- Construction Stormwater
- Industrial Stormwater (Both NOI and CNE)
- Sand and Gravel
- Upland Fin-Fish Hatching
- Water Treatment Plant
- Boatyard

WQWebPortal also accepts the following data for all permits except Aquatic Pesticide general permits and CAFOs:
- Discharge Monitoring Reports (DMRs)
- DMR data (daily values)
- Submittals (narrative conditions)

Finally, WQWebPortal allows operators of industrial facilities to apply for Certification of Non-Exposure (CNE).

Timeline[2]

Ecology is currently redeveloping PARIS to a new platform. At the same time, as general permit are reissued (or issued for the first time), Ecology is creating new Notice of Intent forms on WQWebPortal.

- **December 2017**: PARIS 3.0 completed.
- **December 2017**: PARIS -> ICIS flow internalized.
- **Fall 2018**: Notice of Termination form for Construction Stormwater completed.
- **Fall 2018**: Winery GP NOI form completed.
- **Spring 2019**: CAFO and Aquatic Pesticide permits moved into PARIS.
- **January 2018 – Spring 2019**: PARIS -> ICIS flow extended to remaining permit types.
- **Spring 2018 – Spring 2019:** Scoping, building, and testing additional Phase II data collection and flow to ICIS.
- **Fall 2019:** Individual permit NOIs completed.
- **Winter 2019:** NOTs for remaining permits completed.
- **Summer 2020**: Phase II data flow to ICIS complete.

Throughout 2017-2019, Ecology will be adding new or updating existing NOI forms as general permit reapplication deadlines approach. Permit modification, transfer, and termination forms are also anticipated, though with no specific dates.

Contact Information

Ecology's NPDES permitting electronic systems are maintained by both developers and policy experts.

Developers
- Lester Power: Water Quality IT unit supervisor
- Chuck Chiri: Lead Developer
- Dee Turco: Project Manager
- Nick Groebner: Developer

Policy Experts
- Bill Moore: Section Manager
- Ellie Key: Permitting Policy Lead
- Carissa Glassburn: PARIS Business Lead

Bill Moore and Lester Power are the executive sponsors for our NPDES electronic reporting systems.

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[2] Timeline revised to reflect PARIS 3.0 project completion delay from original plan. Dates are estimates.

Agency NPDES Universe

Table 1

Permit	GP or IP	Active (Total)	Extended	Major	ICIS Flow Permit	ICIS Flow DMR	E-Reporting DMR	E-Reporting NOI
Aquatic Invasive Species	GP	1	-	-	-	-	-	-
Aquatic Mosquito Control	GP	53	-	-	-	-	-	-
Aquatic Noxious Weed Control	GP	1	-	-	-	-	-	-
Aquatic Plant and Algae Mgmt.	GP	189	-	-	-	-	-	-
Boatyard	GP	65	-	-	X	X	X	X
Bridge Washing[1]	GP	-	-	-	-	-	-	-
Burrowing Shrimp (Carbaryl)[2]	IP	-	-	-	-	-	-	-
CAFO	GP	20	-	-	-	-	-	-
CAFO	IP	1	-	-	-	-	-	-
Construction Stormwater	GP	2,692	-	-	X	X	X	X
Fisheries Resource Mgmt.	GP	1	-	-	-	-	-	-
Fruit Packer	GP	177	-	-	X	-	X	X
Industrial Stormwater	GP	1,173	-	-	X	X	X	X
Industrial User to POTW	IP	173	16	-	X	X	X	-
Industrial Wastewater	IP	172	30	25	X	X	X	-
Invasive Moth Control	IP	1	-	-	-	-	-	-
Irrigation Aquatic Weeds	GP	20	-	-	-	-	-	-
Municipal Wastewater	IP	226	80	46	X	X	X	-
MS4 Phase 1	GP	14	-	6	X	-	-	-
MS4 Phase 1 (WSDOT)	IP	1	-	-	X	-	-	-
MS4 Phase 2	GP	152	-	-	X	-	-	-
Net Pen	IP	8	8	-	-	-	-	-
Reclaimed Water	IP	3	-	-	-	-	-	-
Sand and Gravel	GP	892	-	-	X	X	X	X
Upland Fish Hatchery	GP	84	-	-	X	-	X	X
Water Treatment Plant	GP	32	-	-	X	X	X	X
Winery[1]	GP	-	-	-	-	-	-	-
Zostera Japonica Mgmt.	GP	9	-	-	-	-	-	-

[1] The Winery and Bridge Washing general permits are presently being written, with anticipated issuance mid-2018.

[2] Ecology's Burrowing Shrimp Control – Carbaryl permit was terminated on May 11, 2015.

Table 1 numbers are accurate 10/25/2017.

Here are some summary values from Table 1:

- **6,155** total NPDES individual permits and general permit coverages.

- **5,848 (95%)** of those have basic permit data reported to ICIS daily.

- **5,420 (88%)** of those have DMR data reported to ICIS daily.

- **5,631 (92%)** of those submit their DMRs electronically.

- **5,115 (83%)** of those submit their applications/NOIs electronically.

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

Ecology receives data both electronically (through the WQWebPortal), and via paper. Both electronic and paper records are recorded in the PARIS permitting database, with the exception of the aquatic pesticide permits that have their own specialized electronic databases. PARIS data is uploaded to EPA ICIS via a custom ETL (Extract, Transform, Load procedure) every night.

WQWebPortal

As described above, the WQWebPortal, or Portal, is the means by which permittees electronically submit their data to Ecology. This system is functional and is actively maintained, but is based on dated (approximately eight year old) technology. Ecology is planning a significant overhaul in the next 2-3 years.

The Portal is divided into the following sections:

- **Authentication** occurs in two stages.

  - **Secure Access Washington** (SAW): At the first level Ecology employs the State of Washington's SAW single sign-on service. With a SAW account a permittee can submit an application, be associated with a permit, and prepare DMRs or submittals.

  - **CROMERR**: To sign an application or submit DMRs or other submittals to Ecology, a user must sign up for a second level of access using the Electronic Signature Account Form. Once an Ecology employee has received a signed form and verified the identity and statutory authority of the signer, they are authorized to create a second account that meets EPA CROMERR standards.

- **WQWebNOI**: Each application or NOI form is custom for the type of permit applied for, and includes information about the facility, outfalls and monitoring points, the permittee and other contacts, SIC and NAICS codes, and ancillary permit-specific information (such as certain treatment types). Currently the Portal has NOI forms for the Construction Stormwater, Industrial Stormwater, Boatyard, Sand and Gravel, Upland Fin-Fish Hatching, and Water Treatment Plant general permits. There are no electronic forms for individual permits.

- **WQWebSubmittal**: Authorized permittees can submit reports (narrative conditions) as electronic files with associated metadata. PDFs, MS Office files, and image files are among the file types accepted. The Portal allows notes and automatically records dates as well as re-submittals. For specific permits, specialty reports are created as forms; specifically, the MS4 permit annual reports are a series of electronic forms permittees fill out that dynamically display or hide questions depending on their applicability.

- **WQWebDMR**: For most permits, permittees can enter and submit their data into a form that is dynamically created according to the specific monitoring requirements and limits imposed by their permit. Increasingly permittees are required to submit data electronically; for all permits (general and individual) issued since early 2014 electronic reporting is a permit requirement.

  - While all permittees that use WQWebNOI can create outfalls and monitoring points, permittees for the Construction Stormwater and Sand and Gravel GPs can also add new monitoring points or edit (in a restricted fashion) existing monitoring points during their permit coverage.

- **WQWebCNE**: Industrial stormwater permittees applying for a Conditional No Exposure Exemption have their own dedicated section within the Portal. Functionally it is very similar to WQWebNOI; permittees can apply for exemption and see the status of their applications, while the applications themselves are reviewed by Ecology staff.

PARIS

Ecology's **P**ermit **A**nd **R**eporting **I**nformation **S**ystem is the database the agency uses to track NPDES permit data. It is based on Oracle, and is currently on version 2.9. It was preceded by WPLCS, a legacy "green-screen" type application, and development is currently underway on PARIS 3, the Microsoft-based successor application.

Data submitted through the various sections of the WQWebPortal is ultimately recorded in PARIS. Other data is entered directly into PARIS, whether to set up a permit, because the permittee has an electronic reporting waiver, or because electronic submittal hasn't yet been configured for that permit type. These types of data include (but are not limited to) permit attributes, schedules and submittals, outfalls and monitoring points, limit sets and limits, DMRs and DMR data, inspections, violations, and enforcements.

Access to add, update, or delete data in PARIS is restricted by roles. Everyone in Ecology can use PARIS to view permit data. There are roles for inspectors, data entry staff, administrators, and others, each with their own unique permissions.

Facility/Site

Ecology maintains the Fac/Site database as a centralized repository of all locations where an Ecology program has done work. In addition to NPDES permits, this could include air quality permits, spill cleanups, or other environmental tasks.

PARIS currently relies upon Fac/Site to store facility location information, outfalls (but not monitoring points), and contacts. In PARIS 3 contacts will be disconnected from Fac/Site, but PARIS will continue to rely on Fac/Site for facility data and outfall data.

ICIS Flow

Every night permit data moves from PARIS to the ICIS database via a custom ETL procedure written by Windsor Solutions. Partly because that ETL was written for an Oracle system, and partly because Ecology would like greater control over the process, we are currently in the process of re-writing the ETL using Microsoft technology. The deployment of the rewrite will coincide with the PARIS 3.0 deployment. It will continue to perform the same function, and it will continue to utilize the Node written by Windsor Solutions.

Aquatic Pesticide Permit Databases

There are four single-purpose databases that were created to track Aquatic Pesticide general permits: Mosquito Control, Noxious Weed Control, Plant and Algae Management, and Pesticide GP. These databases are currently maintained, but the long-term plan is to retire them and transition their data into PARIS.

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

All electronic reporting work for the State of Washington is performed by internal developers, with contractors hired as needed. Currently the State employs approximately 3 FTEs to work on NPDES-related tools, supplemented by 2 temporary contractors who are assisting in the construction of the new version of PARIS.

Washington State NPDES permittees either submit data electronically to the state or mail in paper documents; they do not use EPA tools directly. The State has a tool to flow data to ICIS that is currently being upgraded, with an anticipated release to coincide with the new PARIS (December 2017). That tool will be updated to include all Phase II data that Washington is required to flow to the EPA.

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

There are six (6) NOIs currently available electronically to Washington NPDES permittees: Construction Stormwater, Industrial Stormwater, Boatyard, Sand and Gravel, Upland Fin-Fish Hatching, and Water Treatment Plant general permits. The WQWebPortal also allows industrial site operators to submit CNE applications. NOTs and LEWs have not yet been implemented.

NOIs are implemented as permit renewal application deadlines arrive. Currently over 80% of Washington NPDES permittees apply for coverage online. The next significant NOIs to be implemented will be the individual industrial and municipal permits. By Fall of 2019 over 95% of permits will have electronic NOIs.

The NOT form for the Construction Stormwater permit was planned for Winter 2016, but is not yet implemented due to resources directed at deploying PARIS 3.0. Additional NOT forms will follow, and should take less time to implement. As with the NOIs, the State anticipates 95% of permits will have electronic NOTs by 2019.

NOEs (CNEs, for Certifications of Non-Exposure) are already fully electronic.

LEWs are stored in the PARIS database, but applications must be submitted via paper. Electronic LEW applications should happen sometime in 2018.

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

Currently CAFO permit files are maintained outside of the PARIS system. Once PARIS 3 is released (anticipated December 2017), Ecology will begin to manage CAFO permits in the PARIS system, including annual reports. A separate task will be building a report to gather CAFO annual report data. The framework to create these kinds of reports already exists in the WQWebPortal. This task will be completed by Spring 2018.

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

Ecology already collects MS4 annual reports through an online, electronic form. Once the fields are made available in ICIS, the data will be added to the PARIS 3.0 -> ICIS data flow.

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

POTWs with pretreatment programs are tracked in PARIS, but the details of their permitting programs are not. Ecology will modify PARIS to track the necessary data, develop a form for the WQWebPortal, and add the collected data to the PARIS -> ICIS data flow by Winter 2019.

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

Ecology issues pretreatment permits directly to industrial users that discharge to POTWs without their own pretreatment permitting programs; these permits are tracked in PARIS. As with the pretreatment program reports, Ecology will modify PARIS to track the necessary data, develop a form for the WQWebPortal, and add the collected data to the PARIS -> ICIS data flow by Winter 2019.

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

PARIS already tracks sewer overflow and bypass event reports. Future work includes creating a section of the WQWebPortal where permittees can submit reports, and adding those reports to the PARIS -> ICIS data flow. Ecology plans to complete that work Winter 2018.

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

The State of Washington permits only a handful of cooling water intakes – approximately 5. Future work includes creating a section of the WQWebPortal where permittees can submit reports, and adding those reports to the PARIS -> ICIS data flow. Ecology plans to complete that work Summer of 2020.

Sewage Sludge/Biosolids Annual Program Reports
Ecology does not have designated authority for biosolids.

CROMERR Compliance Status for Agency Electronic Reporting Systems

Ecology executed an agreement with the EPA implementing CROMERR-compliant electronic reporting effective on 8/13/2009. This approval covers submittals for all programs delegated to the State of Washington under 40 CFR, including:

1. General Permit Reports
2. Concentrated Animal Feeding Operation (CAFO) Annual Program Reports
3. Municipal Separate Storm Sewer System (MS4) Program Reports
4. Pretreatment Program Reports
5. Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs
6. Sewer Overflow/Bypass Event Reports
7. CWA section 316(b) Annual Reports

Since that time, Ecology has implemented numerous additions to its electronic reporting tool (WQWebPortal), each of which utilizes the structure built to comply with CROMERR and is designed to accept different data:

1. **WebDMR** for discharge monitoring reports – 4/2010
2. **WQWebNOI** for construction stormwater applications – 3/2012
3. **WQWebCNE** for conditional no exposure waivers – 3/2012
4. **WQWebNOI** for industrial stormwater applications – 4/2014
5. **WQWebNOI** for water treatment plant applications – 8/2013
6. **WQWebNOI** for sand and gravel applications – 1/2015
7. **WQWebNOI** for fish hatchery applications – 1/2015
8. **WQWebNOI** for boatyard applications – 5/2015

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

Since 2014 most general permits, along with the shells (templates) used to write individual permits, have been updated with language that requires electronic submittal of DMRs. The general permits for

which electronic NOI forms have been created also have language mandating the use of electronic applications.

The following permits still need to be revised to include language mandating electronic reporting:

Table 2

Permit	Anticipated Reissuance
CAFO GP	2022-03
Aquatic Invasive Species	2021-09
Aquatic Mosquito Control	2020-06
Aquatic Noxious Weed Control	2022-02
Aquatic Plant and Algae Management	2021-03
Fisheries Resource Management	2020-09
Irrigation System Aquatic Weed Control	2019-06
Zostera Japonica Control	2019-05

The permits in the table above have not yet been integrated into PARIS and the Portal. Once that happens (Winter 2018, per timeline above) Ecology will consider whether to modify the permits with anticipated reissuance dates later than 2020.

Ecology already has the statutory authority to require permittees to use electronic submittals. Ecology's water quality program (which is primarily responsible for issuing NPDES permits) has adopted policies mandating the use of electronic submittals where available; those same policies also provide for a temporary waiver of electronic submittals under specific conditions.

Temporary and Permanent Waiver Approval Process (127.24c)

Ecology's Water Quality Program has a temporary waiver process that includes a waiver application form, a formal process for routing and approving or denying waiver requests, and form letters for approving and denying requests.

Permittees who wish to receive a waiver from electronic reporting requirements must contact Ecology to obtain a waiver form (https://fortress.wa.gov/ecy/publications/SummaryPages/ecy070381.html). They fill out the form and return it to Ecology, where it is routed to section or regional manager (second-level manager, reporting directly to the Water Quality Program Manager). If the manager deems that the permittee has a genuine hardship, such as a lack of internet connectivity or (in rare cases) a religious objection, an approval letter is forwarded along with paper templates for all necessary submittals. If the application is rejected, a denial letter is forwarded, and the permittee is required to submit data electronically. Waivers are good for no more than 5 years; the Water Quality Program does not issue permanent waivers.

Permittees with approved electronic waivers submit their data to a permit manager or permit coordinator, who then manually enters that data into PARIS. The automated data flow extracts that data from PARIS and loads it into ICIS.

Outreach and Training

Ecology has a total of 18 positions that directly or indirectly help members of the public through their electronic submittals. Most of those positions have other duties as well as their public outreach and support duties; one position is dedicated entirely to answering calls and emails from the public regarding the Portal. In Winter 2016 Ecology expects to hire an additional FTE to support the Portal on a temporary (1 year) basis.[3] The dedicated position and the new, temporary FTE will both have a direct email address (WQWebPortal@ecy.wa.gov) and phone number (1-800-633-6193/Option 3) dedicated for Portal support questions.

Ecology conducts regular trainings on how to use the Portal to apply for permit coverage and submit both submittals and DMRs, including 18 in 2016 (as of October 1). The 2016 trainings that Ecology conducted included the following:

- Boatyard GP NOI & DMR
- Fruit Packer GP NOI & DMR
- Sand & Gravel GP NOI & DMR
- Upland Fin Fish Hatchery GP NOI & DMR
- Individual Permit DMRs

As general permits are reissued (or new permits issued) or new Portal forms are unveiled, Ecology conducts additional trainings to ensure permittees understand the system.

Ecology also maintains extensive help documentation both inside and outside of the Portal:

- Help Pages: http://www.ecy.wa.gov/programs/wq/permits/paris/webdmr.html http://www.ecy.wa.gov/programs/wq/permits/paris/portal.html
- User Manual: https://fortress.wa.gov/ecy/publications/summarypages/1110036.html
- Sand & Gravel GP: http://www.ecy.wa.gov/PROgrams/wq/sand/monitor.html
- MS4 GPs: http://www.ecy.wa.gov/programs/wq/stormwater/municipal/faq.html#s9Reporting
- Construction Stormwater GP (includes both text and a walk-through video): http://www.ecy.wa.gov/programs/wq/stormwater/construction/enoi.html
- Industrial Stormwater GP: http://www.ecy.wa.gov/programs/wq/stormwater/industrial/NOIonline.html

In addition to the links above, each section of the Portal has help pages that describe exactly what every function accomplishes and how to use it.

Alternative Options

With 3.5 permanent FTEs, 2 temporary contractors, and 18 support staff, Ecology is fully committed to supporting the PARIS/Portal infrastructure for the foreseeable future. Significant portions of Phase II have already been either fully or partially implemented in the current electronic reporting systems, including NOIs, NOEs, and MS4 annual reports. Additionally, the developers, contractors, and support

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[3] Position was hired through at least December of 2018.

staff are primarily supported through stable permit fees, and are less subject to economic cycles and budget-cutting than other state functions that rely on general funds.

Ecology's "Plan B" for implementing electronic reporting in the event of a major budget cut or other catastrophic event is to maintain the systems currently in place using external contractors. Windsor Solutions is already familiar with the ICIS data flow, having created the original version. The two temporary contractors working with Ecology are all contracted from the same company and are familiar with the PARIS/Portal system, and could be contracted to both add Phase II functionality and fix issues as they arose.

Obstacles to Rule Implementation

The primary obstacles to implementing e-reporting in Ecology are as follows:

- **Competing priorities**: Ecology is in the middle of upgrading our PARIS database from Oracle to Microsoft; after that we are considering a complete refactor of our Portal application. Additionally, there is a constant stream of enhancement requests and bug fixes to attend to. We manage this potential obstacle by prioritizing work related to the e-reporting rule above other work. Also, transitioning to a common platform and refactoring our tools should make it easier to build the tools needed to meet the Phase II requirements.   Over a four year horizon, these competing priorities may actually result in faster and better implementation of e-reporting requirements.

- **Lack of resources**: As with any state agency, Ecology has limited funding to do its work. Prioritization of work is again a major strategy to handle this obstacle. Ecology also re-evaluates developer resources and needs on a regular basis, and brings on contractors to do discreet pieces of work when the budget allows.

- **Push-back from permittees:** Many of our permittees, particularly in fields such as construction or sand and gravel operations, are unfamiliar with computerized systems and prefer to continue using paper. Ecology has had good success with a combination of written requirements in permits, strict controls over waivers, regular trainings, and dedicated support. This "carrot and stick" approach has led to a dramatic increase in electronic reporting, from 52% of permittees in October of 2015, 72% of permittees in September of 2016, and 80% as of October 2017.

Implementation Plan Reassessment

Ecology will contact the EPA to discuss changes to the Implementation Plan under two circumstances. First, if a major task slips on the timeline identified in the overview, Ecology will revise the implementation plan accordingly and contact EPA regarding the update. Second, if EPA misses targets for implementing Phase II data elements in ICIS, Ecology assumes that EPA will work with states to adjust or extend deadlines for submitting data to EPA.