

# NPDES Electronic Reporting Rule Phase 2 Implementation Plan

## Ohio Environmental Protection Agency-Division of Surface Water December 2016

### Implementation Plan Purpose

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

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

In accordance with the final rule [40 CFR 127.26(h)], authorized NPDES programs must submit an Implementation Plan (IP) to EPA by December 21, 2016, for EPA's review. EPA will inform the authorized NPDES program if the implementation plan has enough detail to ensure successful implementation of electronic reporting for Phase 2 data. Completed IPs can be emailed to EPA using the following email address:

[NPDESElectronicReporting@epa.gov](mailto:NPDESElectronicReporting@epa.gov).

### 1. Overview/Executive Summary

*The Ohio Environmental Protection Agency Surface Water Information Management System (SWIMS) is an integrated NPDES permit drafting and compliance tool utilized by the Division of Surface Water. The current application is complemented by an application-specific database schema housed in the enterprise Oracle RDBMS. Within the database are data elements and milestones pertinent to both facility permitting as well as compliance schedules.*

*The Electronic Discharge Monitoring Reporting (eDMR) system is an entirely web-based service accessible via most internet browsers through any internet connection and is utilized to submit required monitoring data. eDMR is accessible via the Ohio EPA eBusiness Center which is a CROMERR certified portal for online business services since 2007. eDMR has created efficiencies for both the regulated community and Ohio EPA by being a trusted, secure, fast, and well-supported system that produces cleaner data and elevated compliance performance levels. As of 2016, more than 10,000 individuals have used eDMR to submit monthly data for over 5,500 different permits – 100% of all permit reporting requirements are submitted through the system.*

*The Surface Water Tracking, Reporting and Electronic Application Management Service (STREAMS) is a secure service also available through the Ohio EPA eBusiness Center and is utilized for submittal of permit applications, submitting instant fee payments, conducting permit approvals, and for various non-EDMR compliance and reporting tasks. It will replace the paper-based permit application process with electronic applications and payments, provide permit approval process status to applicants electronically, and allows permit holders to submit monitoring reports electronically.*

The Ohio EPA eBusiness Center now features functionality to allow eBusiness Center account holders who possess an Ohio EPA invoice to easily bring up and view the invoice information and electronically pay quickly with a credit card or by debiting a bank account through the Automated Clearing House (ACH). The ePay service provides a more convenient payment method for Ohio EPA's fee payers and will increase the number of ePay transactions to a level that will increase efficiency at Ohio EPA – all within a secure transactional environment. ePayment is currently available for all STREAMS generated invoiced fee payments including the Annual Sludge Fee, and NPDES Individual and General Permit applications submitted through the eBusiness Center.

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Surface Water Electronic Business Services Webpage: <http://epa.ohio.gov/dsw/ebs.aspx>

**2. Agency NPDES Universe**

<b>Individual Permits</b>		
<b>Master General Permit Name</b>	<b>Expiration Date</b>	<b>Number of Covered Facilities</b>
Number of Active & Administratively Continued Major Individual NPDES Permits	5-Year from Date of Issuance	300
Number of Active & Administratively Continued Minor Individual NPDES Permits	5-Year from Date of Issuance	1956
Number of Active & Administratively Continued MS4 Individual Permits	5-Year from Date of Issuance	4
		<b>Total 2260</b>

## *General Permits*

Master General Permit Name	MGP Number	Expiration Date	Number of Covered Facilities
Petroleum Bulk Storage Facilities	OHB000002	7/31/2017	42
Coal Surface Mine	OHM000003	2/28/2014	153
Storm Water - Construction	OHC000004	4/20/2018	22640
Storm Water - Construction - Big Darby Creek Watershed Specific	OHCD00002	9/30/2017	158
Storm Water - Construction - Olentangy River Watershed Specific	OHCO00002	5/31/2019	224
Geothermal System Discharge	OHO000002	7/31/2021	4
Hydrostatic Test Water	OHH000002	10/31/2017	104
Storm Water - Industrial	OHR000005	12/31/2016	3456
Storm Water - Marina	OHRM00002	1/21/2018	62
Non-Contact Cooling Water	OHN000004	2/28/2021	50
Pesticide Application Discharge	OHG870001	10/31/2016	69
Petroleum Related Corrective Action	OHU000006	7/31/2021	46
Small MS4	OHQ000003	9/10/2019	288
Small Sanitary Discharge	OHS000004 & OHV000003	4/30/2020	196
Temporary WW Discharge	OHT000002	4/30/2017	15
Water Treatment Plant	OHW000003	12/31/2017	21
	OHZ0000001	10/17/2021	0
No Exposure Certifications		5-Year from Date of Issuance	1457
			<b>Total 27529</b>

<b>General Permits - State Specific</b>			
<b>Master General Permit Name</b>	<b>MGP Number</b>	<b>Expiration Date</b>	<b>Number of Covered Facilities</b>
Household Sewage Treatment System	OHK000003	1/1/2021	9681
Gravity Sanitary Sewer Extension PTI	3745-42-SS002	8/8/2018	35
Land Application of Hydro-demolition Wastewater	3745-42-HD002	10/25/2021	0
			<b>Total 9716</b>
			<b>Total Permits: 39505</b>
Current as of 12/21/2016			

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

#### *Ohio eDMR*

*Ohio EPA contracted with EnfoTech in 2007 to develop our eDMR module. Since the initial deployment, the eDMR service has been deployed through our CROMERR certified eBusiness Center portal. Approximately one year after initial deployment, permit language was included in all permits with monitoring requirements that required the electronic submission of monthly discharge monitoring reports by the 20<sup>th</sup> of the following month. Once the user account has been established and the Responsible Official or the delegated submitter has properly obtained a Personal Identification Number, their credentials are tied explicitly to specific permit or in some cases groups of permits. This process ensures data integrity of the incoming eDMR reports. For the twelve months between November 2015 and October 2016, Ohio EPA has received 45,989 reports, covering 124,232 monitoring stations for a total of 4,429.025 total measurements. Ohio EPA has consistently received 99.999% of monitoring reports electronically through the eDMR service. Ohio EPA has no current plans to replace this service.*

#### *SWIMS*

*Ohio EPA has developed an integrated NPDES permit drafting and compliance application. Initial software development and production support has been handled using in-house IT resources. This application was coded in PowerBuilder and utilizes an on premise Oracle relational database management system. Both the software application and database schema are collectively referred to as the Surface Water Information Management System (SWIMS). Examples of data elements pertinent to permit drafting found in the SWIMS database schema are template and boilerplate permit language, permit limit tables/compliance schedules, facility information and permit effective dates. Additionally, all data that is submitted through the eDMR module is stored within the SWIMS schema. Once received, there are numerous compliance procedures that are executed either from within SWIMS or from other Compliance-related applications (See Section Compliance/Inspection Application). It is out of this database schema that facility, permit and compliance data is pushed to the Integrated Compliance Information System – NPDES data exchange. Ohio EPA is currently refactoring much of the functionality of this system. A team of contractors and in-house resources are creating a new application in Java while maintaining much of the existing Oracle database. This new application incorporates numerous programmatic changes, technical improvements and ten years of documented enhancements to the current application. The development is being approached in two phases. Phase I is directed at permit drafting while phase II deals with unifying many of our compliance procedures. The current*

timeline for the deployment of the permit drafting module is Spring 2017. Development of the compliance procedures will overlap development of phase I and aiming for a deployment of Autumn 2018.

**STREAMS**

The Surface Water Tracking Reporting and Electronic Application Management Service (STREAMS) was deployed to the CROMERR certified Ohio EPA eBusiness Center portal in October 2015. This service was created to allow facilities to submit electronic NPDES permit applications and non-eDMR permitting reports quickly, correctly and securely. The initial software roll out included only General Permit focused new and renewal applications: Notice-of-Intent (NOI), for which 17 unique application webforms were deployed, Notice-of-Termination (NOT) for any facility covered under a current master general permit and Transfer of Ownership forms. Additionally, the rollout included additional electronic forms for general permit specific co-permittee and individual construction lot coverages. Shortly after the initial deployment we added No Exposure Certification new and renewal NOE applications. In July 2016, numerous NPDES permit required, non eDMR reporting was made available through the STREAMS system. In addition to reports, the new and renewal NPDES individual permit applications, including indirect discharge permit applications and their respective transfer and modification forms were added to the system in July. The STREAMS web service was developed with “hooks” into Ohio EPA’s CORE Facility database, revenue tracking data system and our SWIMS permitting and compliance data system and allows for users to tap into those data systems while using the STREAMS service. The system utilizes “smart” forms to ensure that the minimum requirements of each field are met with respect to formatting and completeness. Additionally, as you work through the form, only the required sections of the application are made available based on how you have populated the application. This streamlines the permit application and the applicant is only required to populate the sections that pertain to the unique circumstances of their specific application. If the applicant is submitting a renewal application, when the form is first initiated, the user will find that much of the form has been pre-populated from their previous application and only the necessary changes and updates will need to be made. If submitting a permit report, the system utilizes the same logic-driven approach and depending on the report, may compile submitted eDMR data into the forms. The system allows for the delegation of forms to a third-party for the population of the forms, however, only a responsible official may ultimately submit the final application. The user may only submit their application with their PIN when the user has satisfied the minimum requirements of form validation. Upon successful submission, the eBiz user is immediately emailed a notification of application submission along with an invoice for any fees and may elect to immediately submit payment through the eBusiness Center e-Pay service, another service available through the eBusiness Center portal. A full list of electronic application forms available in STREAMS as of 12/2016 is listed below:

General Permit NOI Applications	
Bulk Petroleum Fuel Storage Facilities	Small Sanitary Discharges (No BADCT)
Coal Surface Mining Activities	Small Sanitary Discharges
Cleaning of Bridge Joints, Scuppers, Drainage Troughs, and Seats	Temporary Wastewater Discharges
Household Sewage Treatment Systems (HSTS)	Water Treatment Plants
Geothermal System Discharges	NOI Notice of Termination
Hydrostatic Test Water	NOI Notice of Transfer of Ownership
Industrial Storm Water	No Exposure Certificate (NOE)
Marina Storm Water	Construction Site Storm Water
Non-contact Cooling Water	Construction Site Storm Water - Big Darby Creek Watershed
Pesticide Application Discharges	Construction Site Storm Water - Olentangy Watershed
Petroleum Related Corrective Action	Construction Lot Permit Applications
Small MS4	Construction Site Storm Water Co-permittee Permit Applications
Small MS4 Co-permittee	

## Pretreatment Applications

Indirect Discharge Application (EPA 4223)	Indirect Permit Transfer Application (EPA 4116)
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## Individual NPDES Applications

Form 1 – General Information (EPA 3510-1)	Form 2F – Storm Water Industrial Activity (EPA 3510-2F)
Form 2A – Publicly Owned Treatment Works (EPA 3510-2B)	Form 2S – Sewage Sludge (Biosolids) Treatment (EPA 4497)
Form 2B – Concentrated Animal Feeding Operations (EPA 3510-2B)	Application for Modification (EPA 4233)
Form 2C - Manufacturing, Commercial, Mining & Silvicultural Operations (EPA 3510-2C)	Application for Transfer (EPA 4234)
Form 2D – Discharge Process Water (EPA 3510-2D)	Antidegradation Addendum
Form 2E – Do Not Discharge Process Water (EPA 3510-2E)	

## Various Reports

Annual Sewage Sludge Report	Pretreatment Program - Annual Report
NPDES Unanticipated Emergency Overflow Report	Pretreatment Program - Priority Pollutant Report
NPDES Non-compliance Report	Pretreatment Program - Generic Baseline Monitoring Report (BMR) For Categorical Standards
NPDES Compliance Schedule Update Report	NPDES Biomonitoring Report Form - Acute Toxicity Test
Pretreatment Program - Quarterly Industrial Users Violation Report Certification	NPDES Biomonitoring Report Form - Chronic Toxicity Test
NPDES Sanitary Sewer Overflow Annual Report	NPDES Municipal Separate Storm Sewer System (MS4) Annual Report

### *.NET Application Server*

*The Division of Surface Water has developed a standalone .net database application that utilizes a Microsoft SQL database for numerous compliance procedures and program focused reports. Database procedures and services are utilized to pass data from the Oracle SWIMS schema into the Microsoft SQL database. Once the data is in SQL we execute several compliance procedures that compare submitted DMRs against a facility permitted limits and reporting frequency. Examples of these procedures are the non-submittal report and notification procedure, preliminary compliance reporting and notification procedure, and daily false violation report for monitoring frequency errors. These procedures are all executed in a specific order as a part of our overall compliance process. Additionally, it is from this application server that Ohio EPA runs a compliance inspection application. This application allows inspectors to generate a pre-inspection report of facility-specific information and past compliance history before executing a formal compliance inspection. After the site visit, the inspector may generate and upload a notice-of-violation letter and attach it to various metadata elements associated with a site visit. This violation data is also stored in this database. Components of Ohio EPA's ICIS-NPDES dataflow for compliance and violations is compiled from this database. In addition to the compliance procedures, there are numerous permit-related reports available through Microsoft SQL Reporting Services. Examples of reports that may be run and exported to Excel format include but not limited to: Inspection & NOV Letter Inventories, Late Notices, facility assignments, DMR reports, Inspection Summaries, Pending NPDES Applications, NPDES Permitted facilities by permit type, Parameter Lists, Public Notices, Permit Lists by Expiration Date, Permit Lists by County and Permits by District. Many of these reports and processes are necessary to support the current PowerBuilder SWIMS application and may be retired or absorbed into the new Permit Drafting and Compliance tool currently under development.*

*ICIS-XML Generator / ICIS NPDES XML Application / OpenNode 2*

*The Ohio EPA ICIS-XML Generator is a tool developed in Apex available to our ICIS coordinators that takes information from our data systems pertinent to a permit, compliance, schedules and transfers and generates a XML file that is mapped to the requirements of the ICIS framework. This file is generated and manually passed to the ICIS network through Windsor's Open Node by Ohio EPA staff on a consistent schedule. Ohio EPA is exploring the possibility of upgrading to the JAVA plug-in for ICIS-NPDES data exchange.*

Current Ohio EPA ICIS-XML Data Transmission Schedule

Activity Type	Frequency
Discharge Monitoring Report - Individual NPDES Permit	Weekly
Receipt of NPDES Application Date	Monthly
Minor NPDES Issuance	Monthly
Major NPDES Issuance	Monthly
Compliance Inspections	Monthly
Compliance Schedule Completion Date	Monthly
Notice-of-Violation	Monthly
Enforcement Actions - Major	Monthly
Enforcement Actions - Minor	Monthly
Major NPDES Permit - Modification/Revocation	Monthly
Minor NPDES Permit - Modification/Revocation	Monthly

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

<b>General Permit Reporting</b>		
<i>40 CFR 122.26(b)(15), 122.28, 124.5</i>		
Milestones	Status	Target Date
• Deploy NOI/NOT/NOE application forms through STREAMS service within Ohio eBusiness Center (22 smart forms)	Deployed	Q3 2015
• Update internal XML generators to include GP NOI data	Scheduled	Q1 2018
• Update internal XML process to submit GP NOI data to ICIS-NPES through NODE	Scheduled	Q1 2018
• Update internal system to utilize Java-plugin for ICIS-NPDES integration	Planned	TBD
<i>Program Contacts: Ashley Water &amp; Jason Fyffe</i>		
<i>eReporting Contacts: Whitney Works &amp; Robert Ward</i>		
<i>Data &amp; Information Contacts: James Roberts &amp; Robert Ward</i>		



<b>MS4 Program Reports</b>		
<i>40 CFR 122.34(g)(3) &amp; 122.42(c)</i>		
Milestones	Status	Target Date
• Deploy MS4 Annual reports through STREAMS service within Ohio eBusiness Center	Deployed	Q1 2016
• Update internal XML generators to include MS4 Annual Report data elements	Scheduled	Q1 2018
• Update internal XML process to submit MS4 Annual Report data to ICIS-NPES through NODE	Scheduled	Q1 2018
• Update internal system to utilize Java-plugin for ICIS-NPDES integration	Planned	TBD
<i>Program Contacts: Jason Fyffe</i>		
<i>eReporting Contacts: Whitney Works &amp; Robert Ward</i>		
<i>Data &amp; Information Contacts: James Roberts &amp; Robert Ward</i>		

<b>Pretreatment Program Reports</b>		
<i>40 CFR 403.12(i) &amp; 40 CFR 403.12(e)(h)</i>		
Milestones	Status	Target Date
• Deploy Quarterly Industrial Users Violation Report Certification through STREAMS service within Ohio eBusiness Center	Deployed	Q1 2016
• Deploy Priority Pollutant Report through STREAMS service within Ohio eBusiness Center	Deployed	Q1 2016
• Deploy Pretreatment Program Annual Report through STREAMS service within Ohio eBusiness Center	Deployed	Q1 2016
• Deploy Generic Baseline Monitoring Report (BMR) For Categorical Standards through STREAMS service within Ohio eBusiness Center	Deployed	Q1 2016
• Deploy Indirect Discharge NPDES Application through STREAMS service within Ohio eBusiness Center	Deployed	Q1 2016
• Deploy Indirect Permit Transfer Application through STREAMS service within Ohio eBusiness Center	Deployed	Q1 2016
• Update internal XML generators to include Pretreatment Program data	Scheduled	Q1 2018
• Update internal XML process to submit Pretreatment Program data to ICIS-NPES through NODE	Scheduled	Q1 2018
• Update internal system to utilize Java-plugin for ICIS-NPDES integration	Planned	TBD
<i>Program Contacts: Phoebe Low</i>		
<i>eReporting Contacts: Whitney Works &amp; Robert Ward</i>		
<i>Data &amp; Information Contacts: James Roberts &amp; Robert Ward</i>		



## Overflow & Bypass Event Reports

*40 CFR 122.41(l)(4), (l)(6) & (7), (m)(3)*

Milestones	Status	Target Date
• Deploy NPDES Unanticipated Emergency Overflow Report through STREAMS service within Ohio eBusiness Center	Deployed	Q1 2016
• Deploy NPDES Sanitary Sewer Overflow Annual Report through STREAMS service within Ohio eBusiness Center	Deployed	Q1 2016
• Update internal XML generators to include Bypass & SSO reporting data	Planned	Q1 2018
• Update internal XML process to submit Bypass & SSO data to ICIS-NPES through NODE	Planned	Q1 2018
• Update internal system to utilize Java-plugin for ICIS-NPDES integration	Deployment TBD	TBD
<i>Program Contacts: Eric Nygaard, Walter Ariss</i>		
<i>eReporting Contacts: Whitney Works &amp; Robert Ward</i>		
<i>Data &amp; Information Contacts: James Roberts &amp; Robert Ward</i>		

## Sewage Sludge/Biosolids Annual Program Reports

*40 CFR 503*

Milestones	Status	Target Date
• Deploy NPDES Unanticipated Emergency Overflow Report through STREAMS service within Ohio eBusiness Center	Deployed	Q4 2015
• Update internal XML generators to include Biosolid Annual Report data	Planned	Q1 2018
• Update internal XML process to submit Biosolid Annual Reporting data to ICIS-NPES through NODE	Planned	Q1 2018
• Update internal system to utilize Java-plugin for ICIS-NPDES integration	Deployment TBD	TBD
<i>Program Contacts: Betsy VanWormer</i>		
<i>eReporting Contacts: Whitney Works &amp; Robert Ward</i>		
<i>Data &amp; Information Contacts: James Roberts &amp; Robert Ward</i>		

Other NPDES Compliance Reports		
Milestones	Status	Target Date
• Deploy NPDES Non-Compliance Report through STREAMS service within Ohio eBusiness Center	Deployed	Q4 2015
• Deploy NPDES Compliance Schedule Update Report through STREAMS service within Ohio eBusiness Center	Deployed	Q4 2015
• Update internal XML generators to include new report data	Scheduled	Q1 2018
• Update internal XML process to submit new report data to ICIS-NPES through NODE	Scheduled	Q1 2018
• Update internal system to utilize Java-plugin for ICIS-NPDES integration	Planned	TBD
<i>Program Contacts: Scott Sheerin, Ashley Ward</i>		
<i>eReporting Contacts: Whitney Works &amp; Robert Ward</i>		
<i>Data &amp; Information Contacts: James Roberts &amp; Robert Ward</i>		

Other NPDES Biomonitoring Reports		
Milestones	Status	Target Date
• Deploy NPDES Biomonitoring Report Form - Acute Toxicity Test through STREAMS service within Ohio eBusiness Center	Deployed	Q4 2015
• Deploy NPDES Biomonitoring Report Form - Chronic Toxicity Test through STREAMS service within Ohio eBusiness Center	Deployed	Q4 2015
<i>Program Contacts: Eric Nygaard, Gary Stuhlfauth</i>		
<i>eReporting Contacts: Whitney Works &amp; Robert Ward</i>		
<i>Data &amp; Information Contacts: James Roberts &amp; Robert Ward</i>		

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

*All elements of the STREAMS service are designed from origin to implementation to integrate seamlessly into Ohio EPA's existing CROMERR compliant eBusiness Center. The eBusiness Center was certified CROMERR compliant in May 2008. Since the initial certification, our CROMERR System Checklist has been updated twice, once in February 2011 and most recently in June of 2015. By utilizing the certified portal, all modules deployed, both current and in the future, within the eBusiness Center comply with the CROMERR framework required by rule.*

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

*Ohio's current permitting rules require that information must be submitted to Ohio EPA on a form approved by the Director of the Ohio Environmental Protection Agency. (OAC 3745-33-03§A) We will refer to this rule as cause to remove all links to any pdf format application forms on our website as we move into a completely electronic system. Ohio EPA has planned a 30-day window of time in early 2017 where paper forms of General Permit NOI applications will still be accepted, however, after that window any paper form received will be rejected and communication plan executed that will notify applying parties of the eReporting rule, our state permitting rules, and instruction and guidance on how to electronically submit application information. Additionally, as Ohio EPA renews master general permits, the permit submission requirements and any*

reporting required by permit that is covered under phase II of the eReporting Rule will have language incorporated into the renewed master general permit as conditions to utilize the Ohio eBusiness Center for those electronically submitted reports or data. Any new master general permits moving forward will also include the language that requires usage of the Ohio EPA eBusiness Center for all electronically submitted data.

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

### **WAIVER PROCESS**

If a facility contacts Ohio EPA regarding an inability to electronically submit their eDMR, we send to them a hardcopy waiver that must be returned for review. Based on the information provided, we grant either a temporary or permanent waiver in accordance with 40 CFR 127.15 & 127.24 and provide the facility with guidance and instruction regarding proper hardcopy submission of their monitoring information to the Ohio EPA. If a waiver is granted and hardcopies are properly returned to the agency, Ohio EPA staff manually enter those reports into our data system on an as needed basis. The facilities are still required to submit the DMR to our office by the 20<sup>th</sup> of each month to ensure compliance with their permit limits and monitoring requirements.

A similar waiver process will be established for the electronic submission requirements covered in Phase II of the eReporting Rule.

## **8. Outreach and Training**

### **Phase I**

Since the initial deployment of the eDMR module, Ohio EPA has provided users with over 80 training sessions specific to the electronic reporting module. Agency training coordinators have setup sessions at the Ohio EPA district office located throughout the state as well as provided demonstrations at numerous technical and programmatic conferences over the years. Additionally, we have developed extensive guidance available through our webpage that walks users step-by-step through the entire eDMR process from setting up accounts, assigning facilities, understanding the software, troubleshooting errors, delegating submission responsibilities and ultimately, submitting data. Since the deployment of eDMR, Ohio EPA representatives have conducted approximately 80 training and outreach events at conferences, trade shows and specific training sessions to a broad spectrum of audience including facility responsible officials, treatment plant operators, consultants and industry experts.

### **Phase II**

With the launch of the STREAMS service as a method for facilities to electronically submit information, Ohio EPA has developed an outreach plan to promote and advertise the new service to both the existing users of the eBusiness Center that may already be submitting the DMRs electronically (or use the portal for submitting data for other agency programs) but also to potential new users of the system. To successfully market the new service, we first developed a Surface Water specific webpage that is the reference source of the Division's electronic business service information. From this webpage ([epa.ohio.gov/dsw/eps.aspx](http://epa.ohio.gov/dsw/eps.aspx)), existing and prospective users can easily find information pertinent to our online services as well as extensive guidance and instruction, program and assistance contacts and a schedule of upcoming deployments of new modules. Secondly, we utilized existing Ohio EPA listservs to send out scheduled "email blasts" regarding the newly deployed modules. These listservs contain 10,000+ email addresses of prospective users of the eBusiness Center and are focused on the environmental industry. Additionally, we utilized the email addresses of the 10,000+ current Ohio EPA eBusiness Center users to send out monthly notifications of the service. Combined, these two methods of sending out mass notifications was utilized several times over the last twelve months to disseminate information pertinent to eReporting. Ohio EPA has also published information regarding the new service in the quarterly Ohio Water Environment Association. Ohio EPA has had a significant presence over the last 12 months at industry trade shows and conferences where 8 demonstrations and trainings were provided and marketing materials were distributed. At many of these trainings, Operator Certification credit hours were approved for attendees needing to renew their Wastewater Treatment Certifications. These trainings and outreach sessions are scheduled to continue for the next several years as more users and required to use the

*eBusiness Center portal. In addition to offsite trainings, multiple WebEx training events were scheduled in Fall 2016 where it is estimated that 500+ unique users were provided training on the services. For additional notification, Ohio EPA created 4 "Palm Cards", designed to fit into a standard envelope. On these cards were marketing information on the new service and whom to contact for more information and a link to the webpage that contains the guidance and instruction. These were distributed by the Agency at conferences and during on-site meetings at facilities around the state.*

## **9. Alternative Options**

*Ohio EPA does not have a plan "B" for meeting Phase II of the eReporting Rule implementation. We are confident that our electronic services provided through our eBusiness Center will meet the eReporting Rule requirements on schedule.*

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

*One of the requirements of CROMERR is the obligation of the submitter to obtain a personal identification number to be used as a digital signature and the system requirement to validate that PIN to allow any data transactions. The requirement of the PIN is not the explicit issue but rather the process of PIN issuance and the requirements to validate one's identity using a notary public has been identified as a potential pinch point. Our internal paper application issuance process has been optimized and the average time to internally issue a PIN from application receipt is 2 business days, however, the overall time elapsed between facility initiating the process to physical receipt of the PIN can exceed 10-to-14 days, including time spent in the mail. Additionally, the burden of obtaining a notary stamp is placed upon the submitting party. In many instances, it is more expedient for the applicant to simply download, populate and mail in a paper permit application form than it is to download PIN forms, obtain a notary stamp, and mail those forms to Ohio EPA, receive the PIN and then initiate the NPDES permit or reporting process. To alleviate some of the burden on both those wishing to obtain a PIN and our internal staff to issue a PIN as well as reduce the overall time between application and receipt of PIN; Ohio EPA has a scheduled a deploy in February 2017 that has a primary objective of streamlining the PIN process. Using the Lexus-Nexus Instant Verify service, the service will validate the user's credentials and provide them a mechanism to view their PIN in a secure environment that operates within the rules of CROMERR. We will maintain our paper PIN process if users are not able to validate themselves through the verification service. With the implementation of the eReporting Rule now extending to General Permit NOIs and other program reporting we anticipate an influx of both new user accounts and PINs to our eBusiness Center Portal.*

*An additional implementation obstacle is the distribution of resources to meet not only the reporting rule objectives but other USEPA directives existing within the same time frame. One such example, from the standpoint of surface water regulation, is the new Assessment and Total Maximum Daily Load Tracking and Implementation System (ATTAINS) being deployed by USEPA. Since we will have competing simultaneous directives, it will be difficult to secure funding for software development and allocate staff resources to appropriately account for both implementations.*

## **11. Implementation Plan Reassessment**

*This plan will be updated as necessary should any changes to timelines regarding the implementation of the eReporting Rule be anticipated. Ohio EPA will continue to participate in activities involving the ICIS-NPDES Electronic Data Transfer (EDT) Integrated Project Team (IPT) as well as activities associated with the National Environmental Information Exchange Network.*