TODAY'S AGENDA

- Overview of the NPDES Electronic Reporting rule
- How does it affect Industrial Pretreatment Programs
- Things to consider in preparing for this change
- Q&A

THE NPDES ERULE

What is the NPDES Electronic Reporting eRule?

Overview of the NPDES eRule

MANDATES ELECTRONIC REPORTS FOR:

- Discharge Monitoring Reports (DMRs),

- General Permit Reports, (notice of intent to discharge),

- Other specified program reports (like Industrial Pretreatment)

Overview of the NPDES eRule

- Phase 1 Implementation deadline: Dec 21, 2016

  - Included DMRs and Federal Biosolids Annual Report

Overview of the NPDES eRule

- Phase 1 Implementation deadline: Dec 21, 2016

  - Included DMRs and Federal Biosolids Annual Report

- Phase 2 Implementation deadline: Originally Dec 21, 2020

  - **Includes Pretreatment Program Annual Reports**

Overview of the NPDES eRule

Good news!

- In Sep 2020, EPA passed a 5 year extension

- New Phase 2 Implementation deadline: **Dec 21 2025**

EFFECTS ON THE IP PROGRAM

How might this electronic reporting impact my IPP?

Effects on IPP Programs

WHAT DATA YOU COLLECT

- EPA published a technical document on required data elements

- Delegated States may change their requirements to match EPA

- Delegated states will likely require more data elements then EPA

Effects on IPP Programs

HOW YOU COLLECT AND STORE IPP DATA

- New data elements might mean collecting more data…

- Change in paper reports/forms?

- Change in excel files?

- Change in database or software?

- Change in processes?

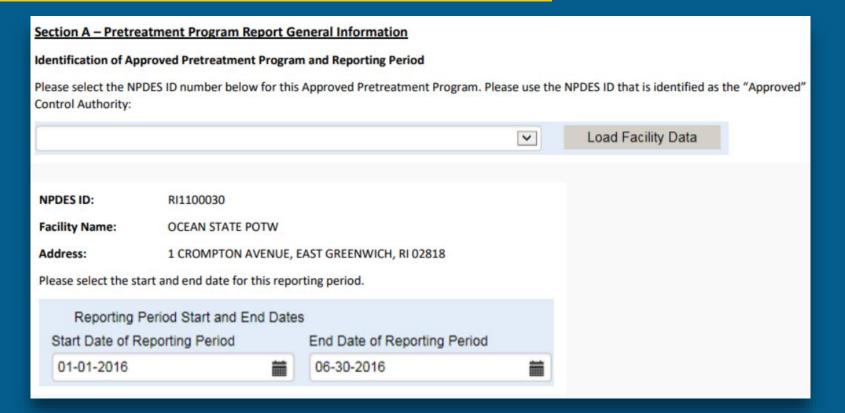# Effects on IPP Programs

HOW YOU **REPORT** IPP DATA

- All electronic!

- IPP's with EPA as Control Authority, will use EPA's "NPDES Electronic Reporting Tool (NeT)"

- IPP's in some states with Control Authority will also be using NeT

- Others will report using their states systems (like South Dakota's SDDENR)

21 States use NeT for other NPDES Reports

State (Code)	State (Name)	EPA Region	Program Report Type	EPA Issued PR	NeT Program Report	State Program Authorization	Estimated Number of Filers
CO	Colorado	8	Pretreatment Program Report - Part 403	Yes	Yes	No	27
DC	District of Columbia	3	Pretreatment Program Report - Part 403	Yes	Yes	No	1
DE	Delaware	3	Pretreatment Program Report - Part 403	Yes	Yes	No	6
IL	Illinois	5	Pretreatment Program Report - Part 403	Yes	Yes	No	48
IN	Indiana	5	Pretreatment Program Report - Part 403	Yes	Yes	No	47
KS	Kansas	7	Pretreatment Program Report - Part 403	Yes	Yes	No	17
MA	Massachusetts	1	Pretreatment Program Report - Part 403	Yes	Yes	No	47
MD	Maryland	3	Pretreatment Program Report - Part 403	No	Yes	Yes	20
ME	Maine	1	Pretreatment Program Report - Part 403	No	Yes	Yes	11
MT	Montana	8	Pretreatment Program Report - Part 403	Yes	Yes	No	6
NH	New Hampshire	1	Pretreatment Program Report - Part 403	Yes	Yes	No	14
NM	New Mexico	6	Pretreatment Program Report - Part 403	Yes	Yes	No	6
NV	Nevada	9	Pretreatment Program Report - Part 403	Yes	Yes	No	7
NY	New York	2	Pretreatment Program Report - Part 403	Yes	Yes	No	57
PA	Pennsylvania	3	Pretreatment Program Report - Part 403	Yes	Yes	No	105
PR	Puerto Rico	2	Pretreatment Program Report - Part 403	Yes	Yes	No	1
RI	Rhode Island	1	Pretreatment Program Report - Part 403	No	Yes	Yes	15
SD	South Dakota	8	Pretreatment Program Report - Part 403	No	Yes	Yes	7
TX	Texas	6	Pretreatment Program Report - Part 403	No	Yes	Yes	74
UT	Utah	8	Pretreatment Program Report - Part 403	No	Yes	Yes	21
WY	Wyoming	8	Pretreatment Program Report - Part 403	Yes	Yes	No	5

Example NeT Reporting Screens

Section A – Pretreatment Program Report General Information

Identification of Approved Pretreatment Program and Reporting Period

Please select the NPDES ID number below for this Approved Pretreatment Program. Please use the NPDES ID that is identified as the "Approved" Control Authority:

[⌄]   **Load Facility Data**

NPDES ID: RI1100030

Facility Name: OCEAN STATE POTW

Address: 1 CROMPTON AVENUE, EAST GREENWICH, RI 02818

Please select the start and end date for this reporting period.

Reporting Period Start and End Dates

Start Date of Reporting Period   End Date of Reporting Period

01-01-2016   📅   06-30-2016   📅

Example NeT Reporting Screens

Section B – Industrial User Information

List of SIU/CIUs Covered by Control Authority's Pretreatment Program.

Control Authorities are required to provide a list of SIU/CIUs covered by their pretreatment program to their NPDES permitting authority with each NPDES permit application process (both individual permits and general permits). Local approved Federal pretreatment programs also provide updates to this list of SIU/CIUs through their Pretreatment Program Report submissions [40 CFR 403.12(i)]. The following is the most current list of SIU/CIUs covered by your pretreatment program. Please update this list as necessary. The "NPDES ID" data element is not editable by the Control Authority.

SIU/CIU NPDES ID	SIU/CIU Name	Industrial User Type	SIU/CIU City	SIU/CIU State	SIU/CIU Zip	SIU/CIU SIC or NAICS Code
*	*	*	*	*	*	*
*	*	*	*	*	*	*
*	*	*	*	*	*	*
*	*	*	*	*	*	*

CLICK HERE   To INSERT, UPDATE, or DELETE one or more SIU/CIUS from this list.

Example NeT Reporting Screens

Summary of Pretreatment Program Violation Determinations in Reporting Period

INSTRUCTIONS: Please use the following tables to provide data related to each SIU/CIU in your approved pretreatment program that you identified as being in SNC in the reporting period. The data from Section 2 will pre-populate the first three columns (i.e., these columns will be uneditable in these tables).

SIU/CIU NPDES ID	SIU/CIU Name	SIU/CIU Type	SNC with Pretreatment Standards or Limits (Yes/No)	SNC with Pretreatment Standards or Limits Pollutants	SNC with Reporting Requirements (Yes/No)	SNC with Other Control Mechanism Requirements (Yes/No)	SNC Related to POTW Discharge or POTW Operations (Yes/No)	SNC Related to POTW Biosolids or Sewage Sludge Management (Yes/No)	Listing of Months in SNC	SNC Published (Yes/No)
*	*	*								

CLICK HERE

<Note: Clicking on this button will allow filers to identify SIU/CIUs in SNC and related details. This table will also allow the Control Authority to indicate whether the Control published notice of the SNC for each SIU/CIU. The list of available SIU/CIUs for SNC identification will be derived from the table in Section 2.>

Example NeT Reporting Screens

Section C – Pretreatment Program Enforcement Actions

Summary of Control Authority Enforcement Actions in Reporting Period
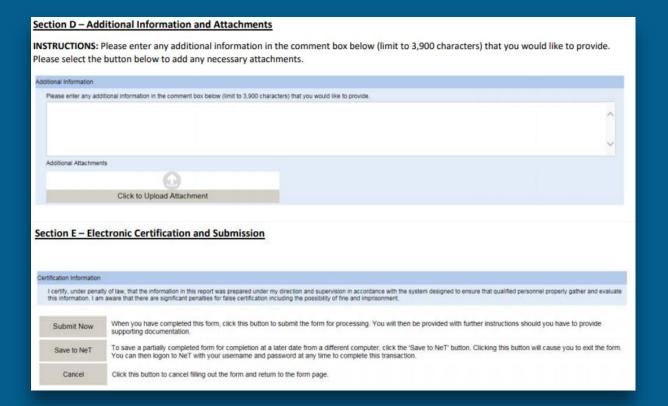
PART A

INSTRUCTIONS: Please use the following table to provide data related to your enforcement actions for each SIU/CIU in your approved pretreatment program. Please identify the number of industrial user enforcement actions for each type of industrial user enforcement action for each NPDES ID.

SIU/CIU NPDES ID	SIU/CIU Name	SIU/CIU Type	Types of Industrial User Formal Enforcement Actions	Number of Industrial User Formal Enforcement Actions by Type
*	*	*	[filer will use pick list with "Other" and free text box to describe "Other" formal enforcement action]	

CLICK HERE

<Note: Clicking on this button will allow filers to identify the type and number of each type of formal enforcement action for each industrial user. The list of SIU/CIUs will be derived from the table in Section 2. This table can be left blank if the Control Authority conducted no formal enforcement actions in the reporting period.>

Example NeT Reporting Screens

Section D – Additional Information and Attachments

INSTRUCTIONS: Please enter any additional information in the comment box below (limit to 3,900 characters) that you would like to provide. Please select the button below to add any necessary attachments.

Additional Information

Please enter any additional information in the comment box below (limit to 3,900 characters) that you would like to provide.

Additional Attachments

Click to Upload Attachment

Section E – Electronic Certification and Submission

Certification Information

I certify, under penalty of law, that the information in this report was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Submit Now	When you have completed this form, click this button to submit the form for processing. You will then be provided with further instructions should you have to provide supporting documentation.
Save to NeT	To save a partially completed form for completion at a later date from a different computer, click the 'Save to NeT' button. Clicking this button will cause you to exit the form. You can then logon to NeT with your username and password at any time to complete this transaction.
Cancel	Click this button to cancel filling out the form and return to the form page.

Preparing for electronic reporting

THINGS TO CONSIDER:

- Am I collecting the right data?

- How much time do I need to get ready for this?

- Do I have the right system or software in place to generate this report electronically?

Collecting the right data?

- Read EPA's Technical Paper #7

- Ask your Control Authority Rep !

How much time to prepare?

- Deadline Dec 2025.
    - All 2025 IPP data will be submitted electronically

- Start preparing now!

- Give yourself at least 1 entire Pretreatment year

Are my systems ready for this?

- How easy is it to get my data together?

- Will I have to type data into NeT?

- What other software is available to help me?

THANKS!

ANY QUESTIONS OR COMMENTS?

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