NPDES Electronic Reporting Rule
Phase 2 Implementation Plan

South Carolina Department of Health and Environmental Control
November 6, 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.

1. Overview/Executive Summary

The South Carolina Department of Health and Environmental Control (SCDHEC) is in the process of deploying a database system that will handle all of the tasks required by the Electronic Reporting Rule. This new system will be a complete replacement for the current SCDHEC database system (EFIS). At present, the EFIS system can flow DMR data through the SC data node into the EPA-ICIS system. It cannot receive any data electronically or flow any data families other than DMR. The other data families are being entered by hand into EPA_ICIS. The new system is being supplied by Windsor Solutions and is already in use by several other state wastewater programs. It will be capable of electronically receiving all data families and transferring the information to ICIS, so DHEC will be the initial recipient of all data families. The current projection for deployment is mid-year, 2017. As the system is already in use elsewhere, it will only require moderate customization for South Carolina-specific tasks prior to deployment. The primary work will involve the loading of our current data into the new system. As ICIS is upgraded to accept Phase 2 data, the system will be upgraded to enable it to electronically receive this data and transfer it to the ICIS system.

The executive sponsor for this program is Myra Reece, SCDHEC Director of Environmental Affairs. The main personnel involved in the system deployment are: David Baize, Bureau of Water Chief; Jennifer Hughes, Bureau of Water Assistant Chief; Glenn Trofatter, Water Pollution Control Division Director; and Dale Stoudemire, Data and Records Management Section Manager. Dale Stoudemire will act as the primary point of contact for this project.

2. **Agency NPDES Universe**

   Permits as of October 25, 2016:

   A. - *Number of Active and Administratively Continued Major Individual NPDES Permits: -*
       # in State System: 159   # in ICIS: 149 -
   B. - *Number of Active and Administratively Continued Minor Individual NPDES Permits: -*
       # in State System: 242   # in ICIS: 217 -
   C. - *Number of Active and Administratively Continued MS4 Permits: -*
       # in State System: 69   # in ICIS: 2 -
   D. - *List of Agency General NPDES Permits with number of authorizations for each:*

Permit #:	General Permit Name	# in State System	# in ICIS
SCR000000	Industrial Stormwater	1738	1985
SCR030000	MS-4 General Permit	65	0
SCR100000	Construction Stormwater	36,113	0
SCG130000	Fish Hatcheries & Preserves	10	0
SCG160000	Pesticide Application	163	4
SCG250000	Utility Water	87	71
SCG340000	Bulk Petroleum Storage Activities	19	0
SCG360000	Hydroelectric Generating Facilities	28	29
SCG570000	Domestic Wastewater	33	33
SCG580000	Wastewater Collection Systems	10	0
SCG640000	Water Plants	65	62
SCG670000	Hydrostatic Test Water Discharges	9	9
SCG730000	Non-Metal Mineral Mining	633	84
SCG750000	Vehicle Wash Water Discharges	7	3
SCG800000	CAFO General NPDES Permit	0	0
SCG830000	Petroleum Contaminated Groundwater	7	3

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

   At present, SCDHEC uses an older database system to track NPDES data. The system is capable of tracking all permit, compliance, and enforcement data, but it is not capable of receiving the data electronically. DMR data is the only data that can be directly transferred to the ICIS database. SCDHEC has purchased the software for a new database system. This system will be capable of electronically receiving all data families and transferring the data to ICIS through the state data node. After minor customization for SC-specific requirements, our existing data will be loaded and the new system will be deployed. Our target deployment is mid-year 2017.

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

NPDES Data Group	Milestones	Target Date

   At this time SCDHEC does not plan to use either the NeT or NetDMR systems. The Agency has purchased software for implementing the Electronic Reporting Rule and has begun the process of customization and deployment. The deployment is progressing well and the initial wastewater module should be in place mid-year 2017. The initial module will be capable of tracking all data families and sending DMR, permitting, compliance, and enforcement data to ICIS-NPDES. It will also be capable of accepting electronic DMR

submittals from permit holders. Future modules will be developed to electronically accept and transmit to ICIS-NPDES all data families required by the electronic reporting rule. As these modules are still under development at the Federal level, our target date for deployment is the December 22, 2020 deadline established by the Electronic Reporting Rule. Until final deployment is complete, data families not included in the initial deployment will be directly entered in ICIS-NPDES.

All significant roles and responsibilities will be completed by SCDHEC staff and the software contractor. The contractor is developing all software and loading data from the legacy system. SCDHEC staff is responsible for defining the scope of the program, correcting data errors in the legacy system, and testing functionality of the new system. The only role for the EPA is to establish the requirements for new data families and provide data schemas as they are developed.

5. CROMERR Compliance Status for Agency Electronic Reporting Systems

The exact CROMERR application approval date for South Carolina is not known at this time. Part of the software package for the new database system is a CROMERR application format that has already been submitted for this same system in other states. We will use this format to prepare and submit our application as soon as a final deployment date has been set. The application will cover all data families.

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

The South Carolina Water Pollution Control Permit: R61-9 already contains language that allows the Department to require electronic submittal of records. SC is already in compliance with this requirement.

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

SCDHEC does not anticipate the need for permanent waivers. None of our plants belong to groups that do not allow use of the internet and the entire state has adequate internet access.

Short term waivers will be granted on an as-needed basis. The Department will require a written request from the permittee explaining the reason for the request and providing a time period for the waiver. The Department will evaluate each request and provide a written response to the permittee. All data received during a waiver will be entered by SCDHEC staff into the State database system and transferred electronically to EPA-ICIS.

8. Outreach and Training

As soon as a final deployment date is set, SCDHEC will contact all current permit holders in writing and inform them of the new requirements. The contact letter will include a simple set of instructions for establishing an account in the new system. The website will contain video training for new users. In addition, Department staff will be available for on-line and in-person training for groups of permit holders if needed. Future permit holders will be introduced to the system as a part of the permitting process.

9. **Alternative Options**

In the event of a failure in our new software, South Carolina will implement the NetDMR system to collect DMR information. We will then re-evaluate our software purchase and determine a pathway forward. This situation is believed to be highly unlikely.

10. **Obstacles to Rule Implementation**

There are 4 major hurdles to overcome in complying with the Electronic Reporting Rule. The first will be to correctly transfer all existing data from our old database to our new one. This is an extremely meticulous process that must account for a very large amount of information acquired over several decades. We are working closely with experts from our contractor to ensure that the data is loaded correctly in as short a time as possible.

The second will be the initial deployment of the system. This will require the retraining of all staff involved with the wastewater programs. We have already begun this process by exposing as many staff as possible to the new system during the development stage.

The third hurdle will be CROMERR approval. The software package that was purchased for our new database comes with a CROMERR application template that has already been used in other states. This template already contains a description of the software elements required by CROMERR. The agency will need to add those portions relating to our internal controls and procedures. This process has already begun.

The final hurdle will be the training the users of our electronic reporting system. In this process, we anticipate that teaching the permit holders about the security requirements to establish an account will require the majority of the effort. We will begin this process as soon as the wastewater module can be deployed.

11. **Implementation Plan Reassessment**

There are three circumstances that will require plan reassessment. The first will occur when the final deployment date for the Wastewater module is set. We will do this as soon as possible. Second, we will reassess when the CROMERR application is ready for submittal. This will occur either at the same time as initial deployment or very soon thereafter. Finally, we will also reassess the plan as modules for the future data families are developed. This will occur periodically as the EPA issues final standards for the families and our contractor completes modules to adopt the standards.