

**NPDES Electronic Reporting Rule
Phase 2 Implementation Plan**

**Alabama Department of Environmental Management (ADEM)
12/21/2016**

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.

1. Overview/Executive Summary

ADEM has made significant progress towards compliance with Phase 2 of the NPDES Electronic Reporting Rule. ADEM already has electronic reporting tools to accept the reports in Table 1a, although additional data fields may need to be added to the State’s NPDES data management system and the electronic reporting tools:

Table 1a-Current Electronic Reporting Capabilities

NPDES Data Group Number	NPDES Data Group	e-Reporting Tool
2	General Permit Reports [Notices of Intent to discharge (NOIs) except MS4 General Permit]	eNOI
5	Concentrated Animal Feeding Operation (CAFO) Annual Program Reports	AFOIS
7	Pretreatment Program Reports	
8	Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs	eDMR
9	Sewer Overflow Event Reports	eSSO

ADEM’s existing electronic reporting tools (Table 1a) and data management systems will be modified to accept the additional data fields/reports required by the NPDES Electronic Reporting Rule by ADEM IT staff or ADEM contractor, as appropriate. ADEM IT staff, with support from ADEM NPDES program staff, will develop new electronic reporting tools for MS4 Annual Reports and CWA section 316(b) Annual Reports. The timelines for the modification or development of ADEM electronic reporting tools are inextricably linked to the availability of the data field criteria in ICIS-NPDES. ADEM plans to be the initial recipient for all Phase 2 Data Groups and plans to have all electronic reporting tools CROMERR approved and NPDES Electronic Reporting Rule compliant by December 21, 2020. Table 4 lists the milestones and target dates for Phase 2 implementation.

Phase 2 implementation will be accomplished by various organizational units within ADEM. ADEM NPDES (non-CAFO) program staff work within the NPDES Industrial/Municipal Branch, Stormwater Management Branch, and Office of Water Services of the Water Division (managed by the Chief of the Water Division). ADEM NPDES (non-CAFO) program staff include Environmental Engineer managers/staff and Environmental Scientist managers/staff. ADEM NPDES CAFO program staff work within the Office of Field Services of the Field Operations Division (managed by the Chief of the Field Operations Division). ADEM NPDES CAFO program staff include Environmental Scientist managers/staff. ADEM IT staff work within the Information Services Branch of the Permits & Services Division (managed by the Chief of Permits & Services Division). ADEM IT staff include Programmer Analysts (Senior and Associates) and an IT System Specialist. The roles and responsibilities of the various ADEM staff are provided in Section 4 of this implementation plan.

The primary contact for ADEM’s Phase 2 Implementation plan is:

Christy Monk, Chief
Office of Water Services
ADEM-Water Division
P.O. Box 301463
Montgomery, AL 36130-1463
(334) 394-4364
cvm@adem.alabama.gov

2. Agency NPDES Universe

Table 2a details ADEM’s current NPDES universe of individual permits as of December 20, 2016. The universe of industrial users is also included since ADEM is the control authority for these facilities in lieu of the POTWs. The counts include permits with a status of “In Effect”, “Administratively Continued”, and what ADEM considers “Active Expired”¹. All active individual permits are in ICIS.

Table 2a-NPDES Individual Permit Universe

Status	Permittee Type	Count
Major	POTW	119
	Non-POTW	56
	Federal	6
Total Majors		181
Minor	POTW	257
	Non-POTW	924
	Federal	5
Total Minors		1,186
Significant	Industrial User	122
Categorical	Industrial User	177
Private	Industrial User	15
Total Industrial Users		314
Phase I	MS4	10
Phase II	MS4	3
Total MS4s		13

¹ ADEM considers a permit to be expired if either a timely reissuance application was not received or no reissuance application was received, and the permit was not reissued prior to expiration. The state does not close out an expired permit until it confirms that no activity or exposure requiring a permit is taking place.

Table 2b details ADEM’s current NPDES universe of master general permits and the current number of authorizations granted under each permit. The number of authorizations is current as of December 20, 2016. The number of authorizations include those with a status of “In Effect”, “Administratively Continued”, and what ADEM considers “Active Expired”². All active general permits and authorizations granted thereunder are in ICIS.

Table 2b-NPDES General Permit Universe

Master General Permit Number	Master General Permit Name	Number of Authorizations
ALG020000	Asphalt	109
ALG030000	Boat/Ship	41
ALG060000	Lumber & Wood	219
ALG110000	Concrete	240
ALG120000	Metals	378
ALG140000	Transportation	445
ALG150000	Food	81
ALG160000	Landfill	100
ALG170000	Paint	10
ALG180000	Salvage/Recycling	400
ALG200000	Plastic & Rubber	68
ALG230000	Stone/Glass/Clay	45
ALG240000	Textile	15
ALG250000	Non-contact Cooling Water	58
ALG280000	Offshore	6
ALG340000	Petroleum	240
ALG360000	Hydroelectric	21
ALG640000	Filter Backwash from Water Treatment Plants	57
ALG670000	Hydrostatic Testing	57
ALG850000	Non-coal/Non-metallic Aggregate Mining	106
ALG870000	Pesticides	50
ALG890000	Less Than 5 Acre Small Mining	421
ALR040000	MS4 Phase II	44
ALR100000	Construction	3,732

Table 2c details ADEM’s universe of current and pending AFO/CAFO registrations for NPDES permit coverage. The number of registrations is current as of December 20, 2016. *(Note: The CAFO program requires annual renewal of NPDES permit coverage via the registration by rule (general permit) process and it covers both AFOs and CAFOs.)*

Table 2c-NPDES AFO/CAFO Universe

AFO/CAFO Registration Status	Number of Registrations
Approved	772
Pending	233

² ADEM considers a permit to be expired if either a timely reissuance application was not received or no reissuance application was received, and the permit was not reissued prior to expiration. The state does not close out an expired permit until it confirms that no activity or exposure requiring a permit is taking place.

3. Current and/or Planned NPDES Data Systems and e-Reporting Tools

Table 3 details the current NPDES data systems and/or e-reporting tools that ADEM currently employs or plans to employ.

Table 3-Current and Planned NPDES Data Systems and e-Reporting Tools

NPDES Data Group Number	NPDES Data Group	Data System/ e-Reporting Tool Name	Current Functions	Planned Functions
2	General Permit Reports [Notices of Intent to discharge (NOIs); Notices of Termination (NOTs); No Exposure Certifications (NOEs); Low Erosivity Waivers and Other Waivers from Stormwater Controls (LEWs)]	eNOI	Electronic reporting system that allows applicants to submit Notices of Intent for coverage under General Permits. All the ADEM’s General Permits can be submitted through eNOI with the exception of the MS4 Phase II General Permit.	System will be expanded to accept Notices of Termination and No Exposure Certifications. ADEM does <u>not</u> grant Low Erosivity Waivers or Other Waivers from Stormwater Controls (LEWs).
5	Concentrated Animal Feeding Operation (CAFO) Annual Program Reports	AFOIS	<p>The Alabama Animal Feeding Operations Information System (AFOIS) is a web-enabled database that allows CAFO operators to apply for Alabama NPDES permit coverage and submit required reports and information via an NPDES permit registration by rule (general permit process) system. EPA eReporting requirements have been in place and operational since AFOIS was implemented in 2005. ADEM required annual NPDES registrations including annual program report information, that confer continuing Alabama NPDES permit coverage to operators are currently automatically transmitted from AFOIS to EPA-ICIS.</p> <p>The annual NPDES registration required by ADEM Admin. Code ch. 335-6-7 includes required NPDES permittee information, required facility information, and detailed</p>	A review of AFOIS is ongoing to ensure continued efficient functioning of the ADEM CAFO program and to ensure that EPA eReporting requirements will continue to be efficiently implemented. If needed, any identified modifications will be implemented prior to the December 21, 2020 deadline.

NPDES Data Group Number	NPDES Data Group	Data System/ e-Reporting Tool Name	Current Functions	Planned Functions
			nutrient management information contained in comprehensive Waste Management System Plans (WMSP) submitted by permittees.	
6	Municipal Separate Storm Sewer System (MS4) Program Reports	Name TBD	ADEM does <u>not</u> currently receive these reports electronically.	ADEM will be the initial recipient; therefore, a reporting tool will be developed. The format of such tool has not been decided, but ADEM may model its tool after EPA's once it is available.
7	Pretreatment Program Reports	eDMR and State NPDES Data System	ADEM is the control authority for all industrial users in the State. All industrial users are required to submit DMRs to ADEM at a frequency no less than semiannually, with most submitting monthly. All DMR data is flowed to ICIS. ADEM also flows its inspection, enforcement, and violation data for these permittees to ICIS.	The state system will be updated to include any additional fields needed to support the data elements related to these program reports.
8	Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs			
9	Sewer Overflow Event and Bypass Event Reports	eSSO	Electronic reporting system that allows permittees that are POTWs or other treatment works treating domestic sewage (TWTDS) to submit electronic sanitary sewer overflow reports (both the 24-hour notification and the 5-day report).	System will be expanded to accept bypass event reports and add addition required fields for sewer overflow reports.
10	CWA section 316(b) Annual Reports	Name TBD	ADEM does <u>not</u> currently receive these reports electronically.	ADEM will be the initial recipient; therefore, a reporting tool will be developed. The format of such tool has not been decided, but ADEM may model its tool after EPA's once it is available.

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

Table 4 details the major milestones and target dates for Phase 2 implementation.

Table 4-Milestones and Target Dates for Phase 2 Implementation

NPDES Data Group	Data System/ e-Reporting Tool Name	Milestones	Target Dates
General Permit Reports [Notices of Intent to discharge (NOIs); Notices of Termination (NOTs); No Exposure Certifications (NOEs)]	eNOI	Update State NPDES data system to accept any additional data fields required by the NERR for NOIs, NOTs, and NOEs that are not currently in ICIS.	TBD but ≤12/21/2020 (based on availability of data field's criteria)
		Update State data flow to transmit any additional data fields to ICIS-NPDES.	TBD but ≤12/21/2020 (based on availability of data fields in State system)
		Update eNOI to accept Notices of Termination.	6/30/2018
		Update eNOI to accept No Exposure Certifications.	6/30/2018
		Update eNOI to accept MS4 Phase II NOIs and NOTs.	6/30/2020
Concentrated Animal Feeding Operation (CAFO) Annual Program Reports	AFOIS	A review of AFOIS is ongoing to ensure continued efficient functioning of the ADEM CAFO program and to ensure that EPA eReporting requirements will continue to be efficiently implemented. If needed, any identified modifications will be implemented prior to the December 21, 2020 deadline.	6/30/2020
Municipal Separate Storm Sewer System (MS4) Program Reports	Name TBD	Update State NPDES data system to accept the additional data fields required by the NERR for these reports.	TBD but ≤12/21/2020 (based on availability of data field's criteria)
		Develop a reporting tool to accept these reports	TBD but ≤12/21/2020 (based on availability of data field's criteria)
		Update State data flow to transmit any additional data fields to ICIS-NPDES.	TBD but ≤12/21/2020 (based on availability of data fields in State system)

NPDES Data Group	Data System/ e-Reporting Tool Name	Milestones	Target Dates
Pretreatment Program Reports	eDMR and State NPDES Data System	Update State NPDES data system to accept the additional data fields required by the NERR for these “reports”. As the control authority, all information will be generated by the State with the exception of the discharge monitoring data.	<p><i>For Phase 2 data elements currently in ICIS:</i></p> <p>1/1/2020</p> <p><i>For Phase 2 data elements <u>not</u> currently in ICIS:</i></p> <p>TBD but ≤12/21/2020 (based on availability of data field’s criteria)</p>
Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs		Update State data flow to transmit any additional data fields to ICIS-NPDES.	TBD but ≤12/21/2020 (based on availability of data fields in State system)
Sewer Overflow Event and Bypass Event Reports	eSSO	Update State NPDES data system to accept any additional data fields required by the NERR for sewer overflow event reports and all data fields for bypass event reports.	TBD but ≤12/21/2020 (based on availability of data field’s criteria)
		Update eSSO to accommodate any additional data fields required by the NERR for sewer overflow event reports and all data fields for bypass event reports.	TBD but ≤12/21/2020 (based on availability of data field’s criteria)
		Update State data flow to begin transmitting sewer overflow event reports and bypass event reports to ICIS-NPDES.	TBD but ≤12/21/2020 (based on availability of data fields in State system)
CWA section 316(b) Annual Reports	Name TBD	Update State NPDES to accept data fields for these reports.	TBD but ≤12/21/2020 (based on availability of data field’s criteria)
		Develop a reporting tool to accept these reports	TBD but ≤12/21/2020 (based on availability of data field’s criteria)
		Update State data flow to transmit any additional data fields to ICIS-NPDES.	TBD but ≤12/21/2020 (based on availability of data fields in State system)

Roles and Responsibilities for each Data Group

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

ADEM utilizes an NPDES data management system developed by a State contractor to manage its NPDES data and flow the data to ICIS-NPDES. ADEM NPDES program staff will review the required data elements for General Permit Reports and determine which data elements are not available in its current data system. Upon availability of the criteria for the required data fields in ICIS, ADEM NPDES program staff and ADEM IT staff will coordinate with its contractor for the addition of the fields to the State’s NPDES data

management system. For the submittal of NOIs, NOTs, and NOEs, ADEM utilizes an e-reporting tool (eNOI) developed by ADEM IT staff. ADEM NPDES program staff will coordinate with ADEM IT staff to review the changes that will need to be made to eNOI to support the submittal of all required reports and data fields. ADEM IT staff will modify the data flow to ICIS with the new required data fields. The milestones and target dates are summarized in Table 4.

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

Note: The CAFO program requires annual renewal of NPDES permit coverage via the registration by rule (general permit) process. As such, there is not a separate annual report and all required information is currently required to be electronically submitted for ADEM review as part of the annual NPDES permit coverage registration.

ADEM utilizes the ADEM-AFOIS NPDES data management system (hereafter, "AFOIS") developed by ADEM IT staff for CAFO program NPDES data and to flow the data to ICIS-NPDES. ADEM CAFO program staff will review the required data elements for CAFO Annual Reports and determine which data elements are not available in its current data system. Upon availability of the criteria for the required data fields in ICIS, ADEM CAFO program staff will coordinate with ADEM IT staff for the addition of the fields to AFOIS. AFOIS already allows electronic reporting by regulated entities so no further action would be needed. ADEM IT staff will modify the data flow to ICIS with the new required data fields. The milestones and target dates are summarized in Table 4.

C. Pretreatment Program Reports - See 40 CFR 403.12(i)

Note: ADEM is the control authority for all industrial users in the State. No POTW's submit Pretreatment Program Reports. All data pertaining to industrial users (except for DMR data) will be entered by ADEM NPDES program staff.

ADEM utilizes an NPDES data management system developed by a State contractor to manage its NPDES data and flow the data to ICIS-NPDES. ADEM NPDES program staff will review the required data elements for the Pretreatment Program Report data fields that are applicable to the State as the control authority and will determine which data elements are not available in its current data system. Upon availability of the criteria for the required data fields in ICIS, ADEM NPDES program staff and ADEM IT staff will coordinate with its contractor for the addition of the fields to the State's NPDES data management system. ADEM NPDES program staff will enter the data for the required data elements for the Pretreatment Program Report data fields that are applicable to the State. ADEM IT staff will modify the data flow to ICIS with the new required data fields. The milestones and target dates are summarized in Table 4.

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

ADEM already receives discharge monitoring data from industrial users via its eDMR e-reporting tool and then this data is loaded into the State's NPDES data management system. This data does flow to ICIS. ADEM NPDES program staff will review the required data elements for the remaining Significant Industrial User Compliance Report data fields that are applicable to the State as the control authority and will determine which data elements are not available in its current data system. Upon availability of the criteria for the required data fields in ICIS, ADEM NPDES program staff and ADEM IT staff will coordinate with its contractor for the addition of the fields to the State's NPDES data management system. ADEM NPDES program staff will enter the data for the required data elements for the remaining Significant Industrial User Compliance Report data fields that are applicable to the State. ADEM IT staff will modify the data flow to ICIS with the new required data fields. The milestones and target dates are summarized in Table 4.

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

ADEM utilizes an NPDES data management system developed by a State contractor to manage its NPDES data and flow the data to ICIS-NPDES. ADEM NPDES program staff will review the required data elements for Sewer Overflow/Bypass Event Reports and determine which data elements are not available in its current data system. Upon availability of the criteria for the required data fields in ICIS, ADEM NPDES program staff and ADEM IT staff will coordinate with its contractor for the addition of the fields to the State's NPDES data management system. For the submittal of Sewer Overflow/Bypass Event Reports, ADEM will utilize an existing e-reporting tool (eSSO) developed by a State contractor. ADEM program staff will coordinate with ADEM IT staff to review the changes that will need to be made to eSSO to support the submittal of the required reports and data fields. ADEM NPDES program staff and ADEM IT staff will coordinate with its contractor for the addition of the bypass reports to eSSO and any additional data fields for sewer overflow reports to eSSO. ADEM IT staff will modify the data flow to ICIS with the new required data fields. The milestones and target dates are summarized in Table 4.

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

ADEM utilizes an NPDES data management system developed by a State contractor to manage its NPDES data and flow the data to ICIS-NPDES. ADEM NPDES program staff will review the required data elements for CWA section 316(b) Annual Reports and determine which data elements are not available in its current data system. Upon availability of the criteria for the required data fields in ICIS, ADEM NPDES program staff and ADEM IT staff will coordinate with its contractor for the addition of the fields to the State's NPDES data management system. For the submittal of CWA section 316(b) Annual Reports, ADEM will utilize an e-reporting tool that will be developed by ADEM IT staff. ADEM NPDES program staff will coordinate with ADEM IT staff for the design and development of the e-reporting tool. ADEM IT staff will modify the data flow to ICIS with the new required data fields. The milestones and target dates are summarized in Table 4.

5. CROMERR Compliance Status for Agency Electronic Reporting Systems

A. General Permit Reports

Estimated Planned CROMERR Application Date: No later than 6/30/2020

B. Concentrated Animal Feeding Operation (CAFO) Annual Program Reports

Estimated Planned CROMERR Application Date: No later than 6/30/2020

C. Municipal Separate Storm Sewer System (MS4) Program Reports

Estimated Planned CROMERR Application Date: No later than 6/30/2020

D. Pretreatment Program Reports

ADEM is the control authority for all industrial users in the State. No POTW's submit Pretreatment Program Reports. All data pertaining to industrial users (with the exception of DMR data) will be entered by the State. CROMERR approval would not be necessary.

E. Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs

CROMERR Approval Date: 11/9/2015 (80 FR69222). This approval is specific to Discharge Monitoring Reports. (Note: ADEM is the control authority for all industrial users in the State. All industrial users are required to electronically submit DMRs to ADEM at a frequency no less than semiannually, with most submitting monthly. All DMR data is flowed to ICIS.)

All remaining compliance and enforcement data related to industrial users is entered into the State data system by State personnel. CROMERR approval would not be necessary for the reporting of this data.

F. Sewer Overflow/Bypass Event Reports

CROMERR Approval Date: 11/9/2015 (80 FR69222). This approval was granted for the eSSO system, which currently only receives sanitary sewer overflow reports (Alabama has no combined sewer systems). However, the addition of the data elements needed to accommodate bypass event reports would not affect the CROMERR approval.

G. CWA section 316(b) Annual Reports

Estimated Planned CROMERR Application Date: No later than 6/30/2020

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

The necessary state regulatory changes to implement the NPDES Electronic Reporting Rule were adopted December 16, 2016, and will be in effect on February 3, 2017. No changes in State statutes are required to implement the rule. All individual and general permits issued after December 21, 2015 incorporated electronic reporting requirements. It was not necessary for ADEM to open any existing permits to incorporate electronic reporting requirements because the permits do not contain any language prohibiting electronic submittals.

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

ADEM will process waiver requests as outlined in 40 CFR §§127.15 and 127.24, and the appropriate portions of these sections have been adopted into the State regulations. ADEM has not granted any waiver requests thus far and only intends to grant temporary waivers under extreme circumstances. For applicants/permittees granted temporary or permanent waivers that submit reports, notices, and certifications via hard copy, the State will enter the data into its NPDES data management system. It will flow to ICIS-NPDES along with data received electronically.

8. Outreach and Training

A. Outreach

The requirements to electronically submit the required reports, notices, and certifications are being added to the appropriate permits as they are being issued. As reporting tools are modified or developed, ADEM will directly notify existing permittees of the availability of such reporting tools, as applicable. Information about e-reporting will be added to the ADEM website.

B. Training

As appropriate, instructions for use of each e-reporting tool will be developed for the regulated entities and will be available on each tool's webpage. ADEM has given and will continue to give demonstrations of its e-reporting tools at conferences and workshops when the appropriate audience is present. ADEM will develop additional tools or conduct training should it determine there is a significant need. ADEM does not want to divert its resources to develop additional tools or conduct training until such a need is noted.

9. Alternative Options

For the electronic reporting tools already implemented (eNOI, AFOIS, and eSSO), ADEM will only be updating those systems to accept the additional reports, notices, and certifications. Since these tasks will be completed by

ADEM's staff or ADEM's current contractor (ADEM secured a multipurpose grant to assist in funding the additional work by the contractor), it is unlikely that an alternative option is needed. ADEM has no plans for EPA to be the initial recipient for any report, notice, or certification.

For the Municipal Separate Storm Sewer System (MS4) Program Reports and the CWA section 316(b) Annual Reports, ADEM plans for internal staff to develop the reporting tool(s). If ADEM staff is unable to develop a usable tool(s), ADEM plans to ask for the code for the tools that EPA develops for these reports since it is our understanding that it will be open source. ADEM would then modify the tool(s) for its own uses. ADEM has no plans for EPA to be the initial recipient for these reports.

10. Obstacles to Rule Implementation

ADEM anticipates that the primary obstacle to its successful and timely implementation of Phase 2 of NPDES Electronic Reporting Rule will be delays due to the new data fields not being available in ICIS-NPDES sufficiently early for ADEM to have the information necessary to update its internal system and to develop its tools. It is critical that EPA make the new data fields available in ICIS-NPDES as early as possible BEFORE the compliance date so that states can design their systems and tool and test the flow of information.

11. Implementation Plan Reassessment

Until such time as all elements of Phase 2 have been completed, ADEM will contact its EPA regional ICIS-NPDES data administrator at least once each calendar semiannual period to discuss its progress toward compliance as well as any impediments it has encountered. At that time, it will be discussed whether an updated plan should be submitted. ADEM will also update its plan to replace any "TBD" placeholders that are dependent upon an EPA or State action. These updates shall be submitted within 60 days of the completion of the dependent action.