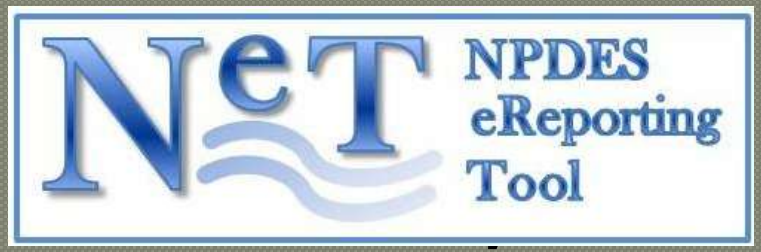
NPDES Electronic Reporting Tool (NeT)



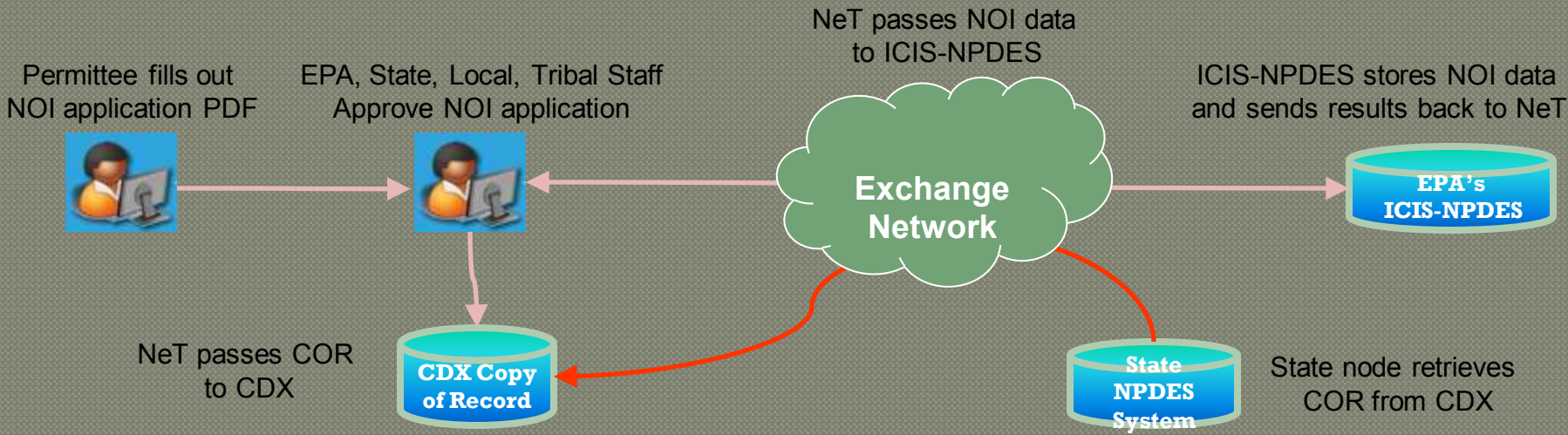
Alison Kittle, U.S. EPA, OECA/OC/ETDD

Presentation Outline

- **NeT Overview**
- NeT Storm Water Multi-Sector NOI Form
- NeT Implementation Plan

NeT Overview

- NPDES Regulated Community fills out one or more Notice of Intent (NOI) application or Program Report PDF forms hosted by NeT on the Internet
- Regulatory authority staff review and approve or reject NOI application PDF
- NeT Electronically Submits NOI application and Program Report data to ICIS-NPDES through the Exchange Network
- CDX Stores Copy of Record (COR) for States to download using the Exchange Network



NeT Overview

- NeT Components are:
  - CDX – used to register and manage user accounts, capture electronic signature agreements, digitally sign PDFs and store Copies of Record
  - Avoka SmartForms – used to create fillable PDF forms with data checks, business logic, and mappings of PDF fields to XML submission file tags for ICIS-NPDES
  - Adobe LiveCycle – used to host multiple NOI and program report forms on the Internet, route forms to Regulatory Authorities for approval, apply digital signatures to forms, create CORs and pass them to CDX, create XML submission files and submit them to ICIS-NPDES, and report ICIS-NPDES processing results to all interested parties

NeT Overview

- Funded and hosted by OECA in support of the EPA and state e-Enterprise Initiative (for example, the proposed NPDES Electronic Reporting Rule)
  - Populates ICIS-NPDES with general permit covered facilities with their limit data, and special regulatory program reports
- Built to host all EPA Regional NPDES Notices of Intent (NOIs) and compliance reports for General Permits tracked by ICIS-NPDES
  - Region 6 Oil and Gas Outer Continental Shelf NOI in production October 2012
  - Office of Water's Newest Storm Water Multi-Sector Industrial Permit scheduled to be in Production May 2014
  - Plans to pilot a state specific form in 2014
- May be used to host NPDES Notices of Intent (NOIs) and compliance reports for any interested State, Local or Tribal Agency

NeT Overview

- In Full Compliance with CROMERR:
  - CDX registration process used for creating and managing NeT user accounts
  - CDX's Lexis/Nexis identity proofing used for electronic signature agreements (ESAs)
  - CDX produces paper water ink signature agreements in lieu of digital signatures
  - CDX electronic digital signature applet used for NOI and Compliance Report signing ceremony and Copy of Record (COR) creation/storage
  - EPA CROMERR application approved as blanket coverage for all EPA Regional Permits
  - Streamlined CROMERR application approval process being established for States wanting to use NeT

NeT Overview

- Uses Existing Data Flow on the Exchange Network to Submit Data to ICIS-NPDES
  - Master General Permit must be entered into ICIS-NPDES with limits structured to allow them to be copied to newly covered facilities established by NeT
  - Creates and maintains General Permit Covered Facility records and copies any applicable limits from the Master General Permit in ICIS-NPDES from NeT NOI data
  - Terminates General Permit Covered Facility records in ICIS-NPDES from NeT Notice of Termination (NOT) data
  - Creates and maintains Special Regulatory Program Compliance Report data in ICIS-NPDES from NeT data such as CAFO Annual Reports

Presentation Outline

- NeT Overview
- **NeT Storm Water Multi-Sector NOI Form**
- NeT Implementation Plan

NeT Storm Water Multi-Sector NOI Form

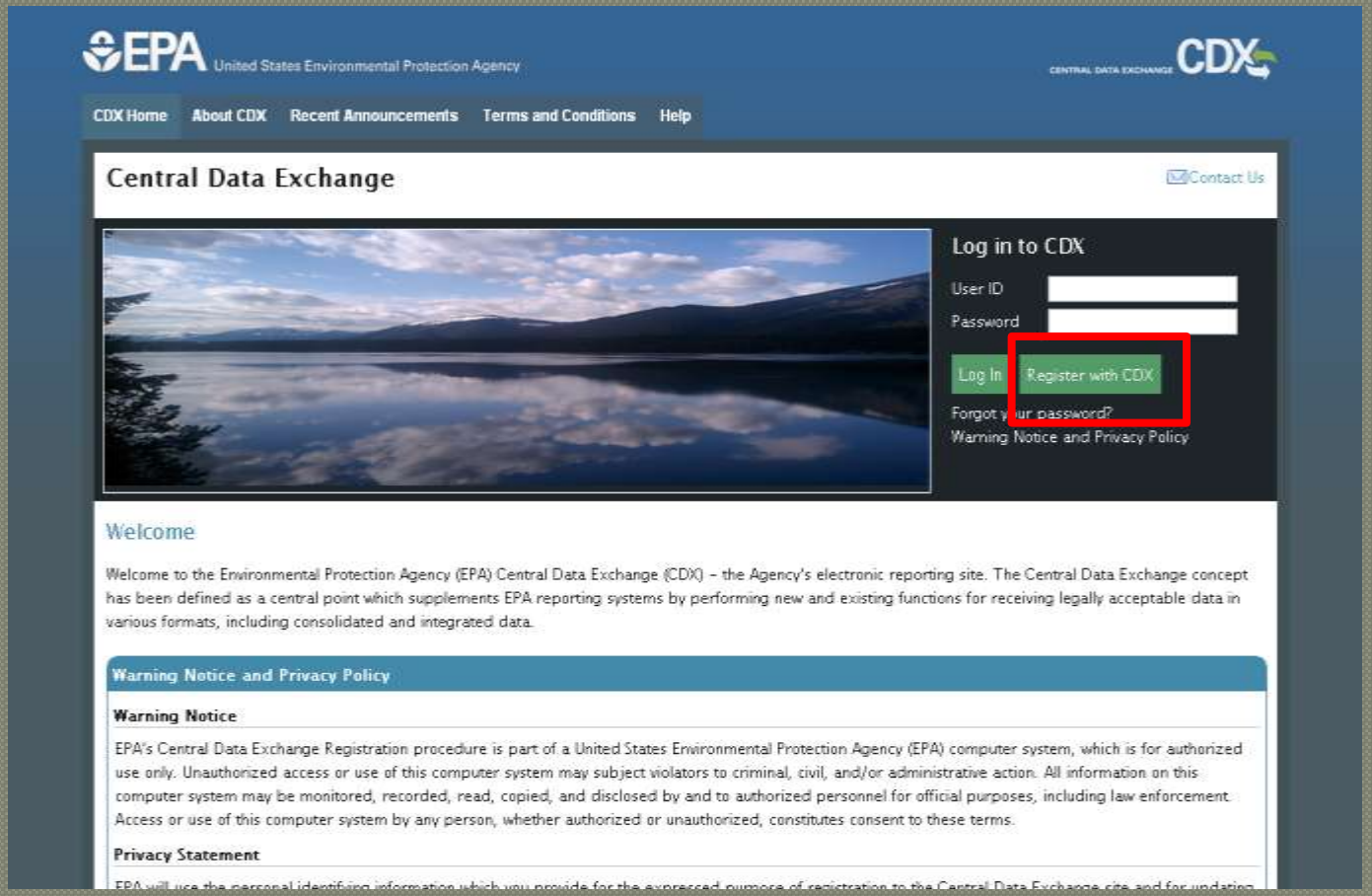
First Step:

- Preparer, Responsible Official or Certifier clicks hyperlink on EPA Regional web page to register, or prepare/ submit an NOI form in PDF format
- Hyperlink invokes CDX Web which has Certifier, Preparer or Responsible Official create account or log into existing account
- CDX passes existing users to NeT directly or has new users register first:
  - Certifiers and Responsible Officials Must Sign Digital Electronic Signature Agreement under CROMERR
  - Lexis/Nexis used for electronic identity proofing
  - Paper Signature Agreement available if identity proofing fails

CDX Registration Process

Page: Landing Page 'Register with CDX' button

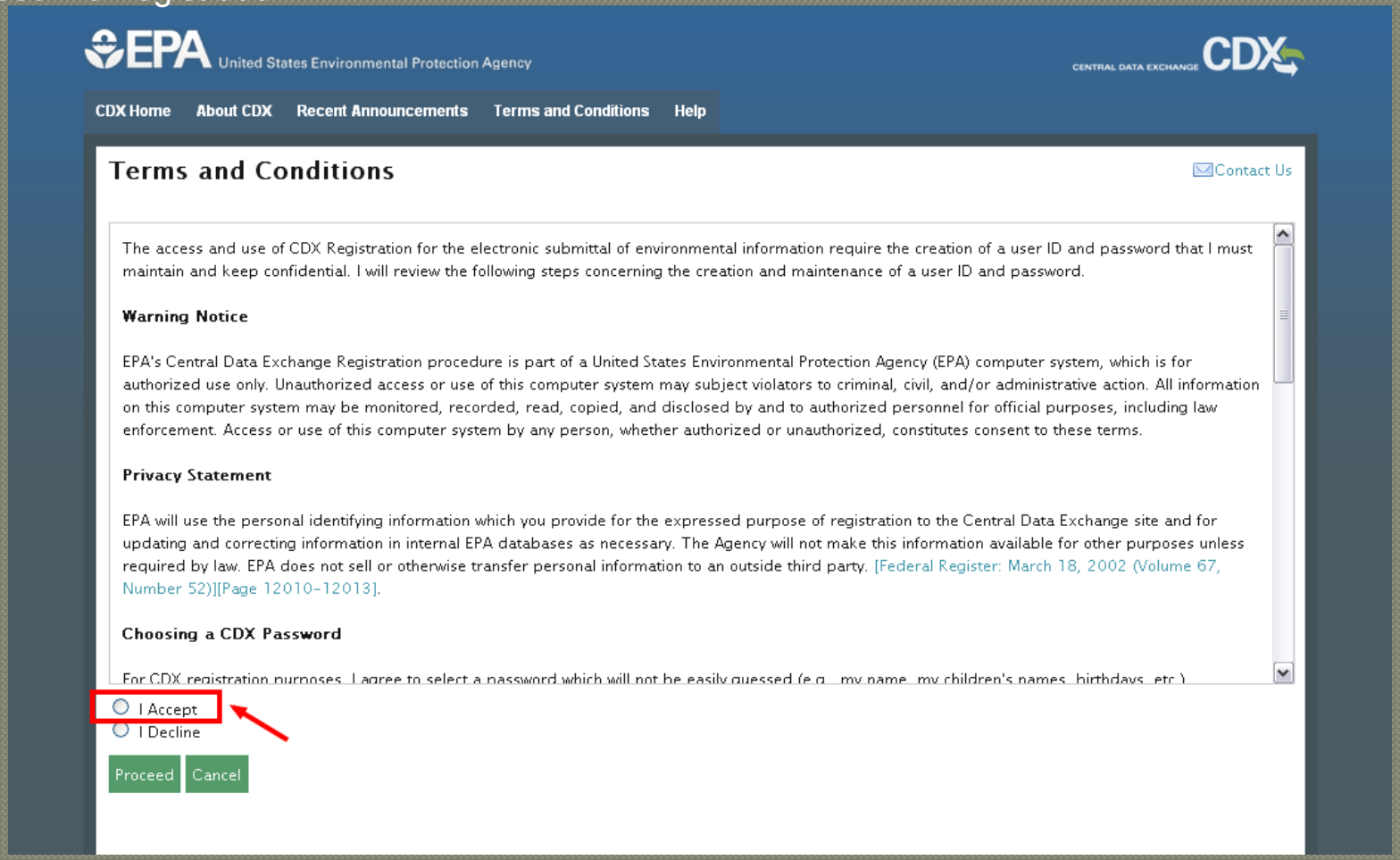
- Registration can be initiated by clicking the 'Register with CDX' button.



CDX Registration Process

Page: Terms and Conditions 'Accepted'

The user will be required to accept the terms in order to proceed with registration.



CDX Registration Process

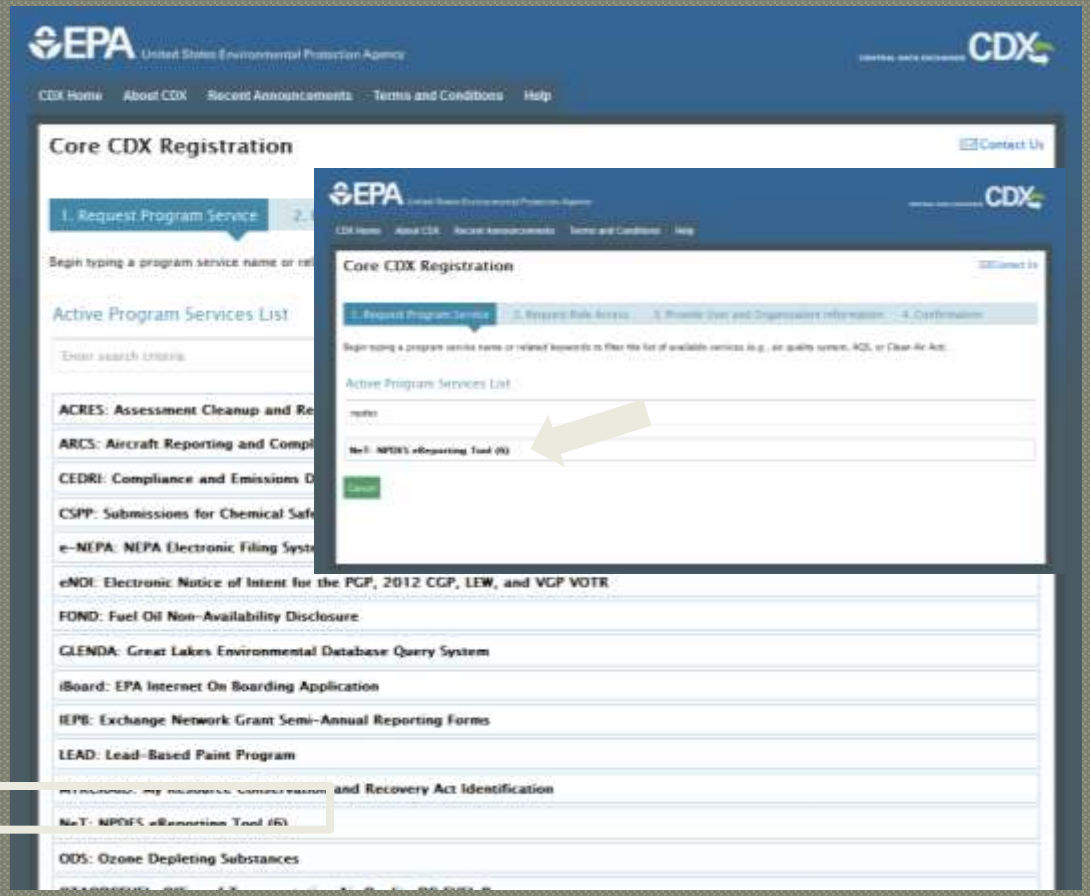
Page: Request Program Service

The user will be brought to the **Request Program Service** screen where they will choose the NeT program service group.

They can filter the list by typing in keywords such as any word from the desired program service or additional keywords.

Current keywords:

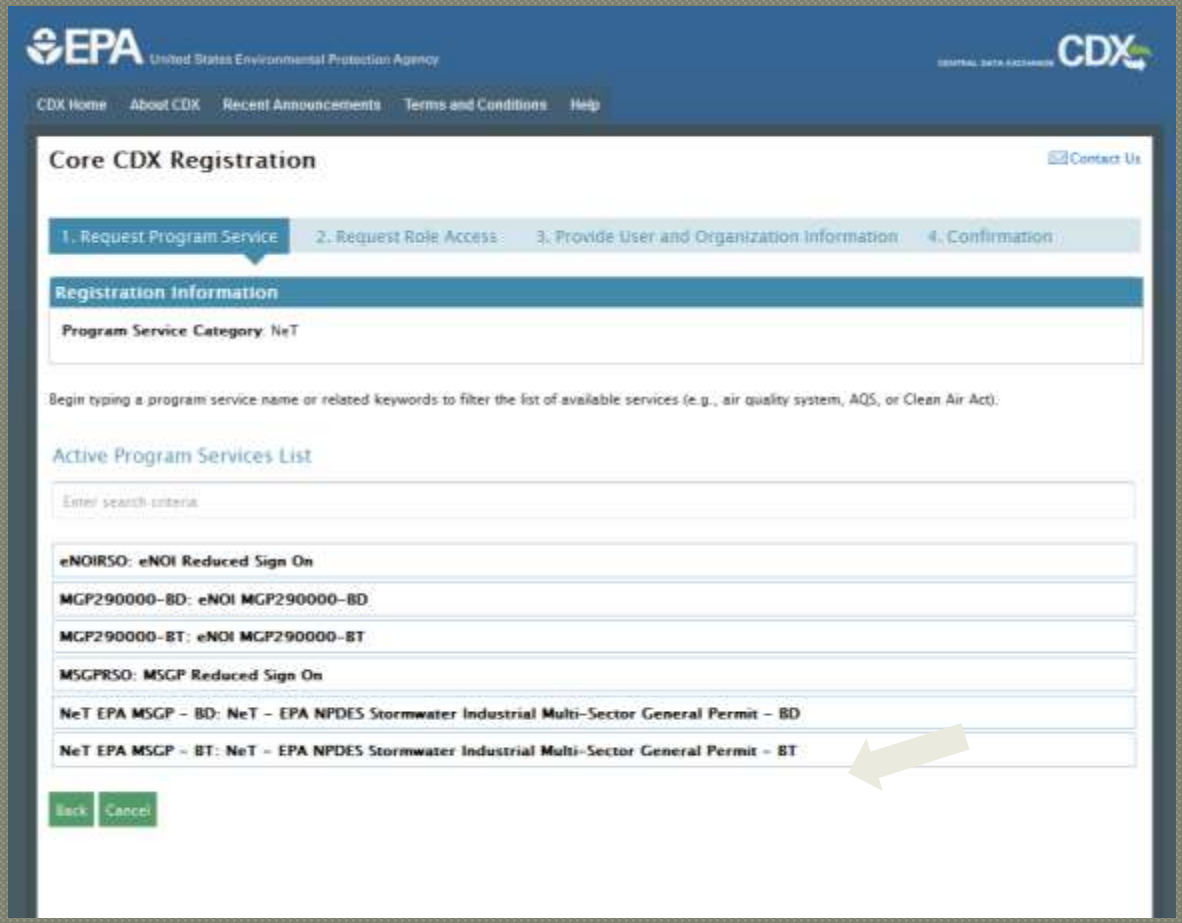
- MSGP
- NPDES
- Industrial
- Multi-sector
- Stormwater
- Storm water
- sw



CDX Registration Process

Page: Choose NeT Program Service

The user will have the option to choose the specific program service from within the NeT group of program services.



CDX Registration Process

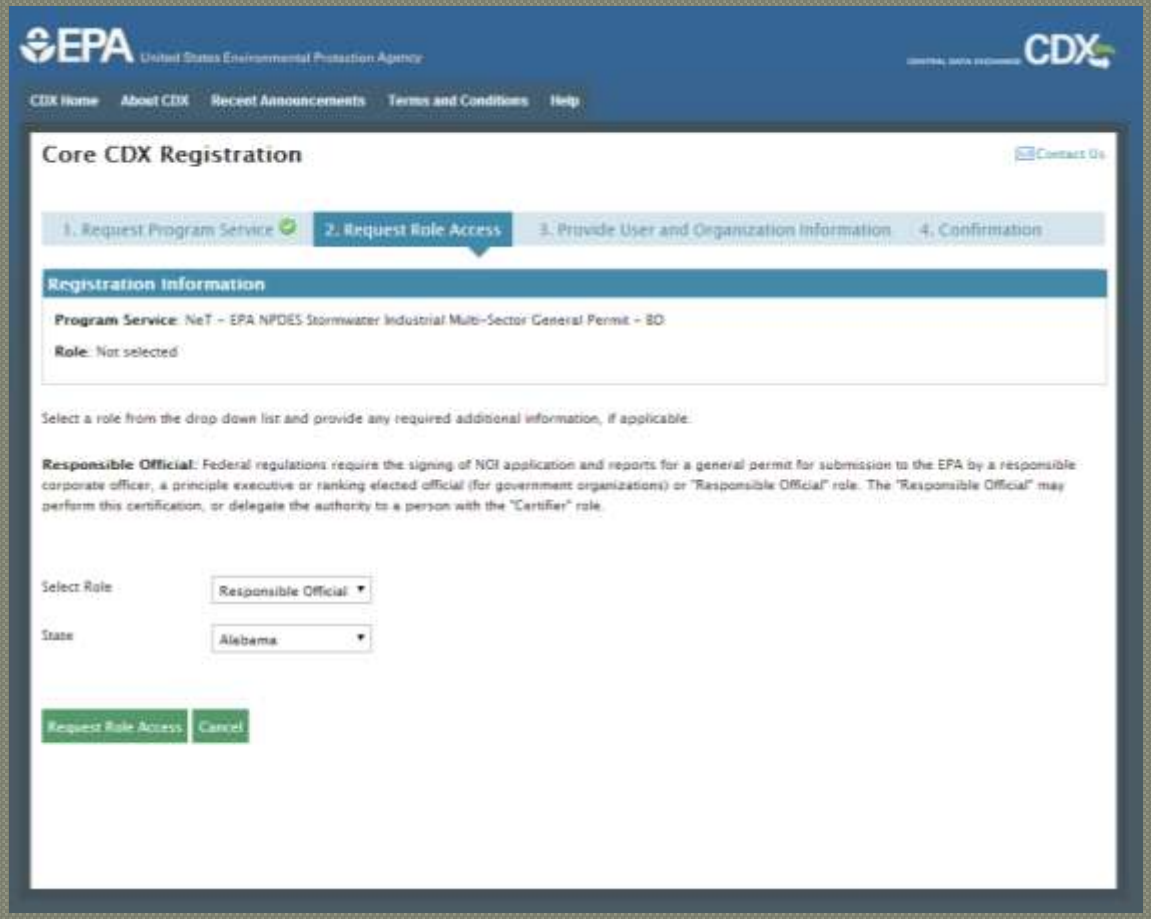
Page: Choose Responsible Official Role

The user will be brought to the **Request Role Access** screen where they will choose the Responsible Official role.

The user will be prompted to provide the state for which work is performed. This feature supports the notifications that will be sent to Regional RMAM users.

Other role options include:

- Preparer (no state)
- Certifier (state required)

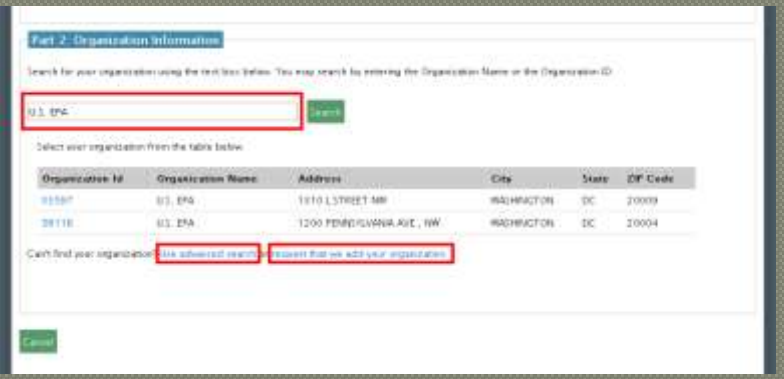


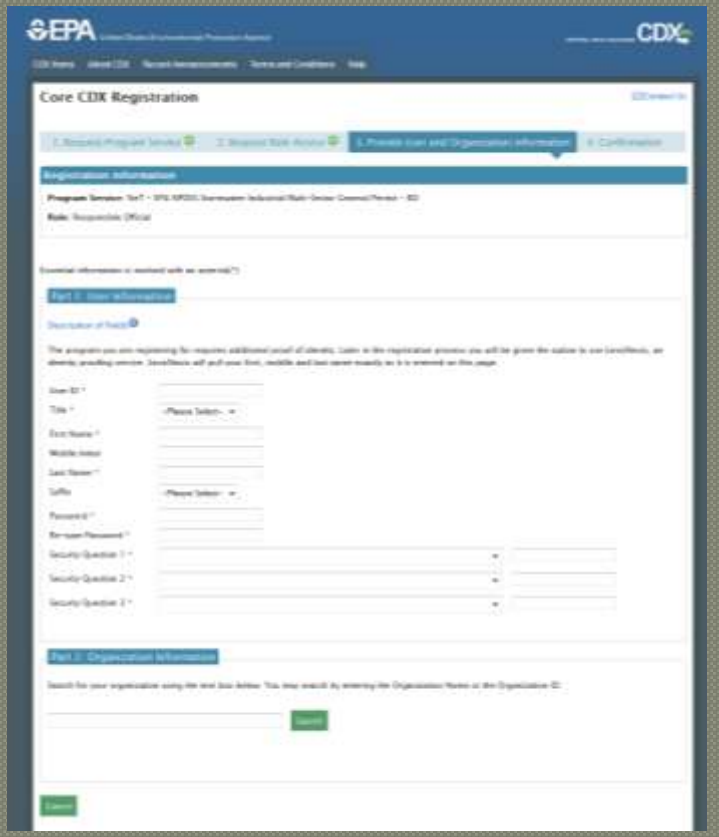
CDX Registration Process

Page: Provide User and Organization Information

The user needs to provide a User ID, password, personal and organization information on this page.

Basic organization searches can be done by entering text in the search box. Results are populated below. Advanced search and request to add new organization links are also displayed.

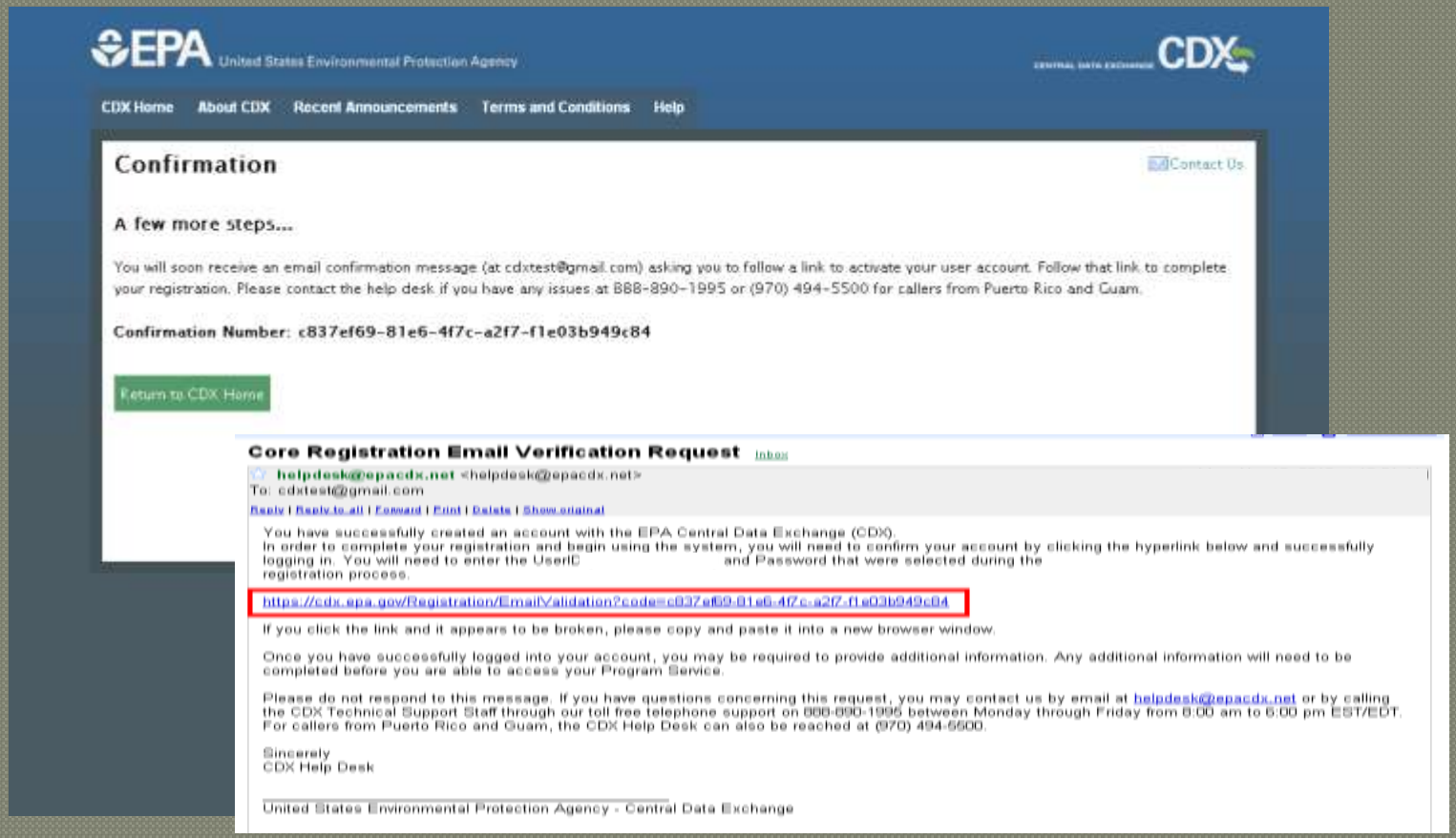




CDX Registration Process

Page: Confirmation and Email

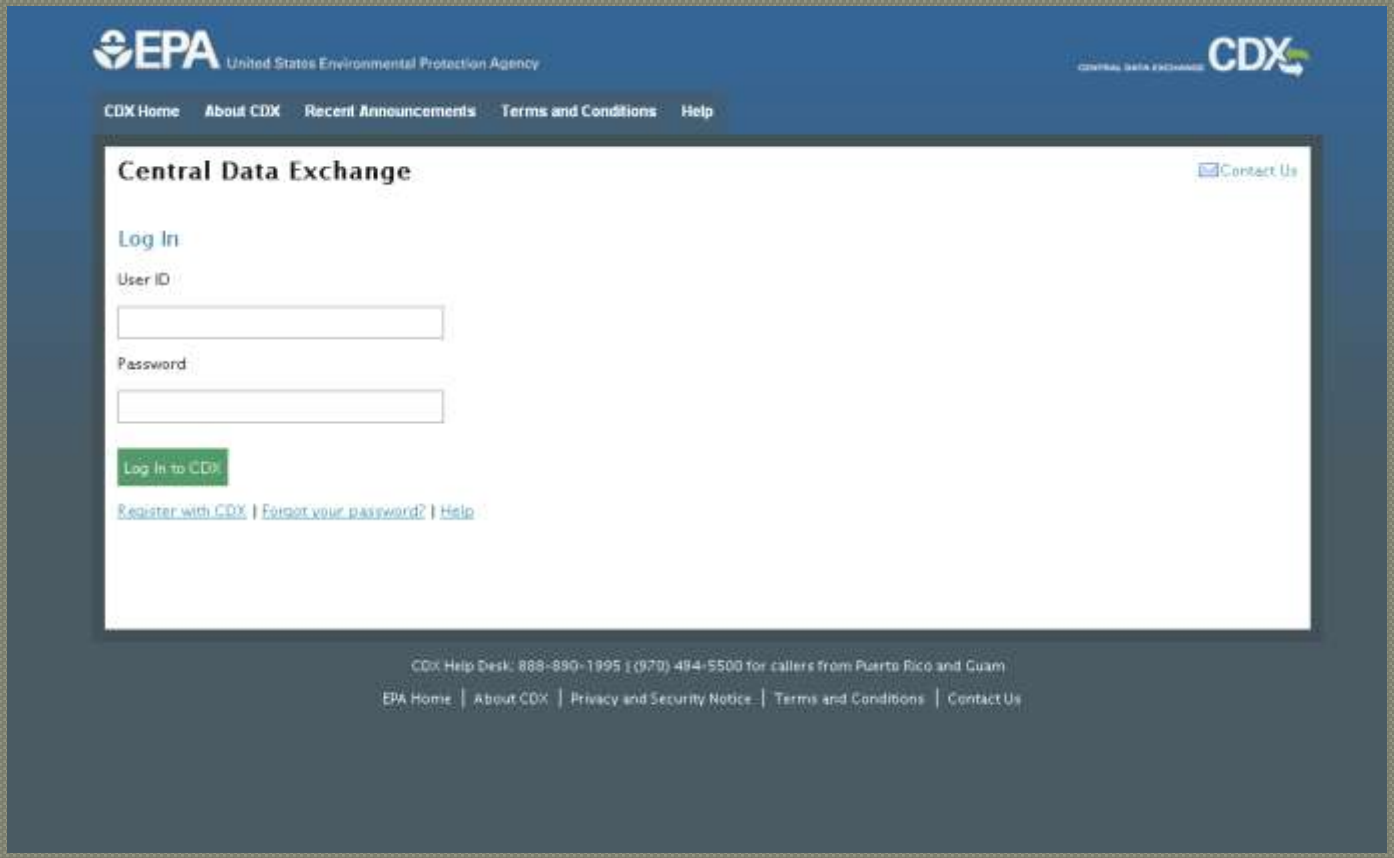
Completing the registration will bring the user to the **Confirmation** screen. An email will be sent to the email they registered with.



CDX Registration Process

Page: Complete Email Verification

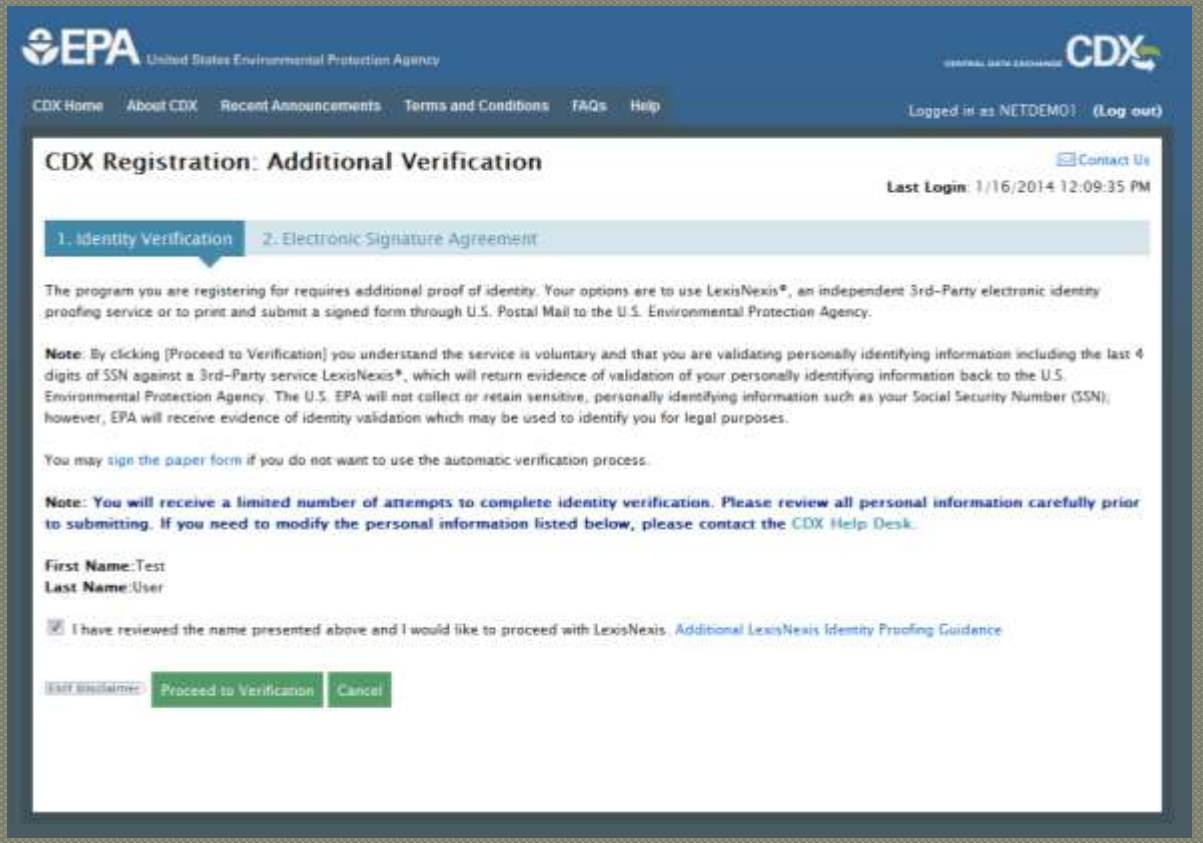
Clicking the link will direct the user to log in to CDX to complete the email validation process.



CDX Identity Verification Process

Page: Choose Verification Option

- Users will have the option to use electronic identity verification (LexisNexis) or proceed with manual identity verification (Regional RMAM approval).
- To use LexisNexis, click on the **Proceed to Verification** button.

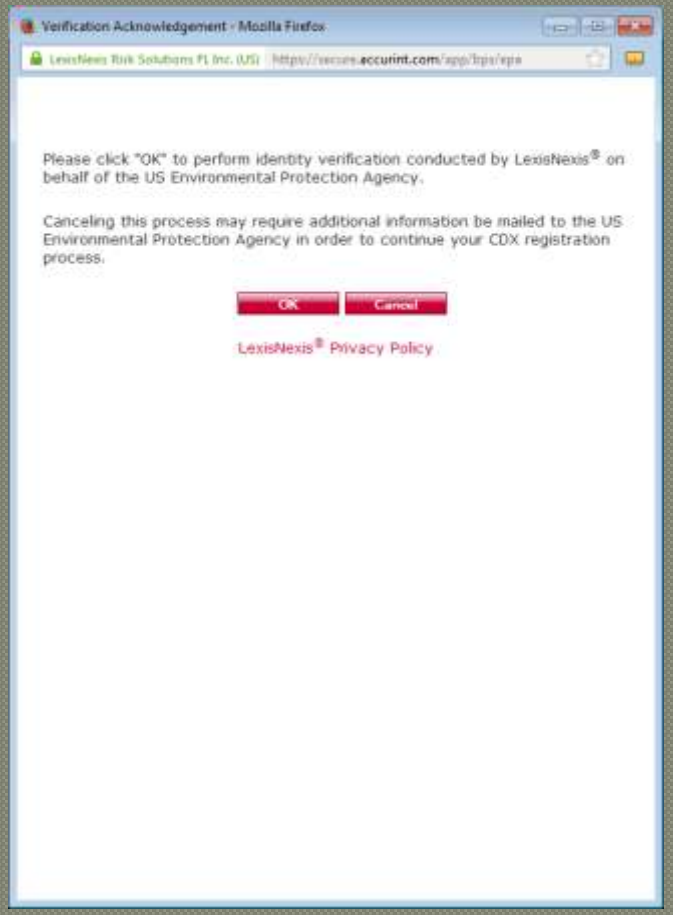


CDX Identity Verification Process

Page: Provide Personal Information to LexisNexis

Users will be prompted with a pop up window to provide personal information for verification purposes.

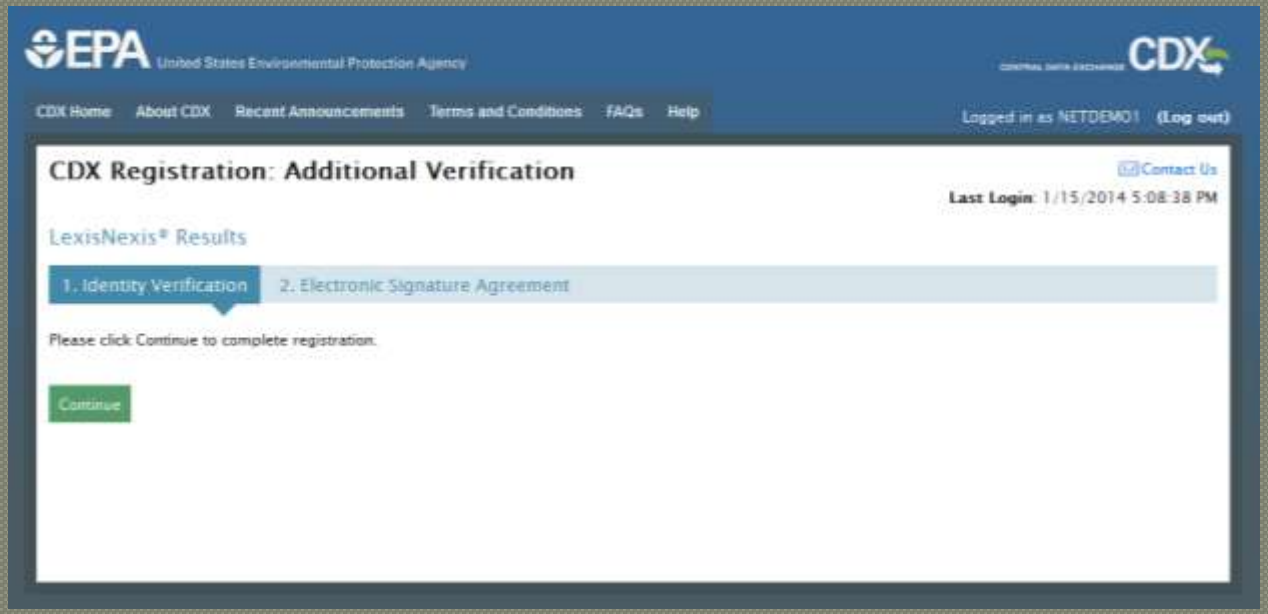
The only information that CDX provides LexisNexis are the First and Last Names provided during registration.



CDX Identity Verification Process

Page: Complete Electronic Verification

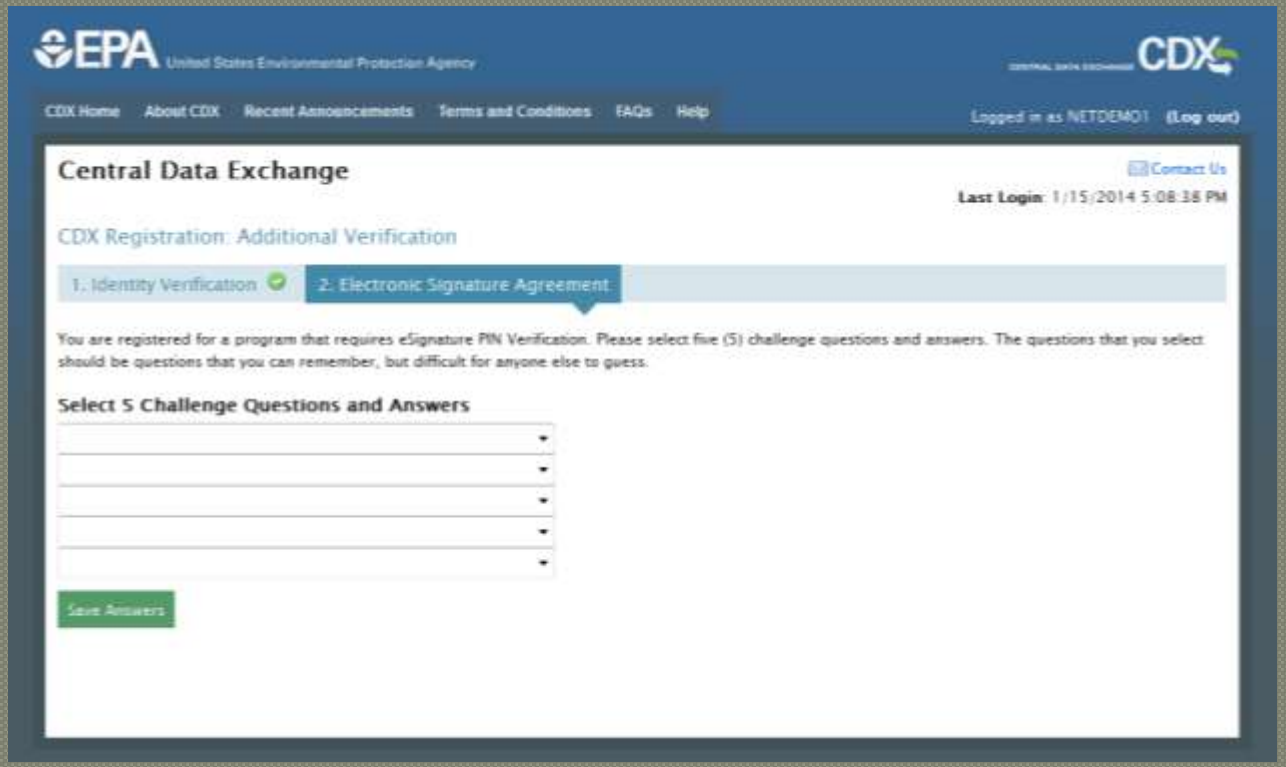
- Users will be redirected back to CDX where they can complete the electronic identify proofing process by clicking the **Continue** button.
- It is at this point where CDX will determine whether the results received from LexisNexis are passable.
- **NOTE:** If passable, the user will be able to sign the ESA electronically. If not, the user will need to use the manual identity verification process.



Electronic Signature Agreement

Page: Set up challenge questions and answers

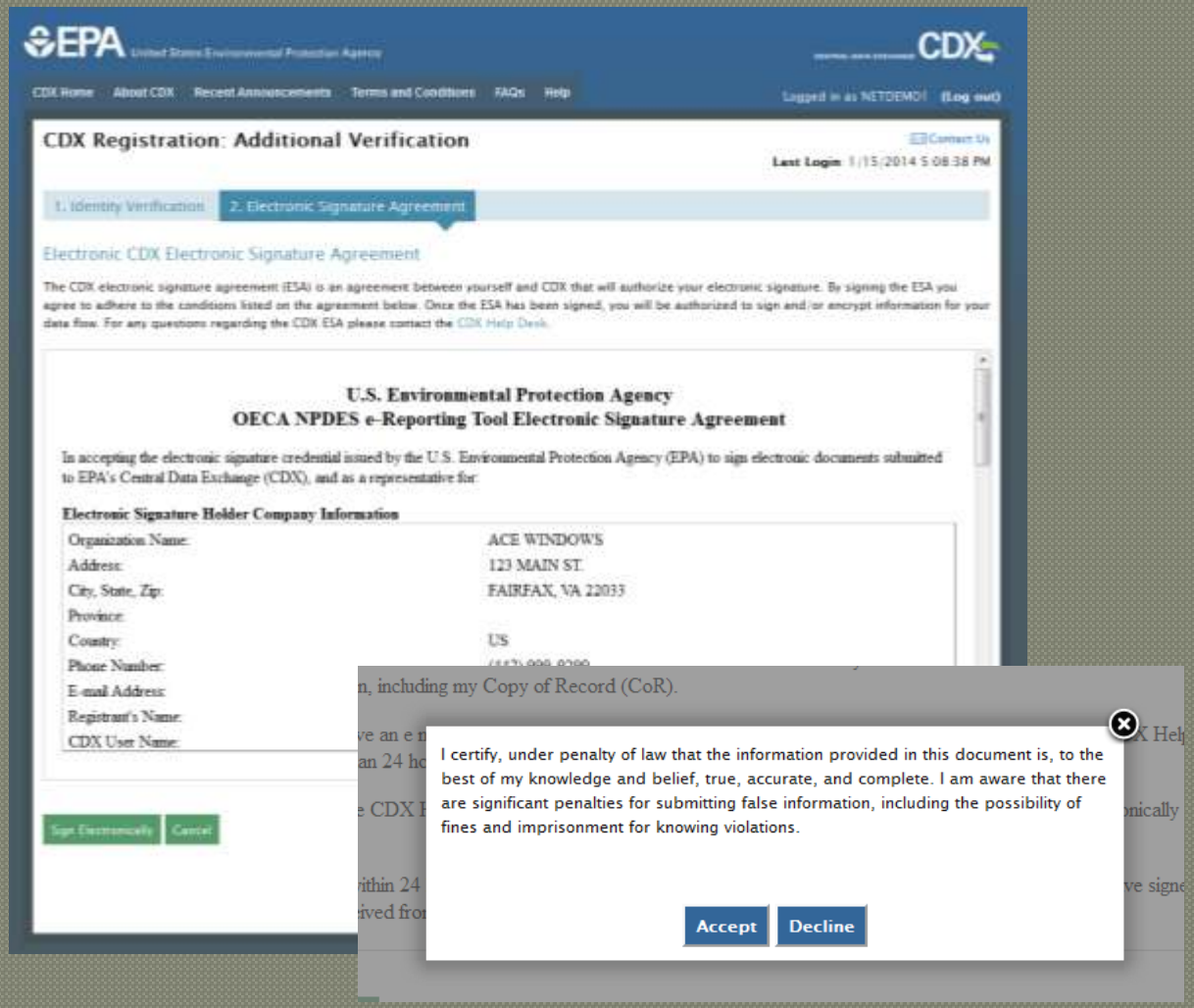
- If the user receives passable results, CDX will prompt them to choose 5 challenge questions and answers.
- During any electronic submission within CDX or the NeT tool, the user will be prompted with one of these questions at random to answer.
- **NOTE:** These questions and answers are not the same as the questions and answers chosen during registration. If forgotten, the user should contact the CDX Help Desk for assistance.



Electronic Signature Agreement

Page: Review and accept attestation

- The user will be directed to sign the CDX ESA electronically. After clicking the Sign Electronically button, the user is prompted to accept attestation.

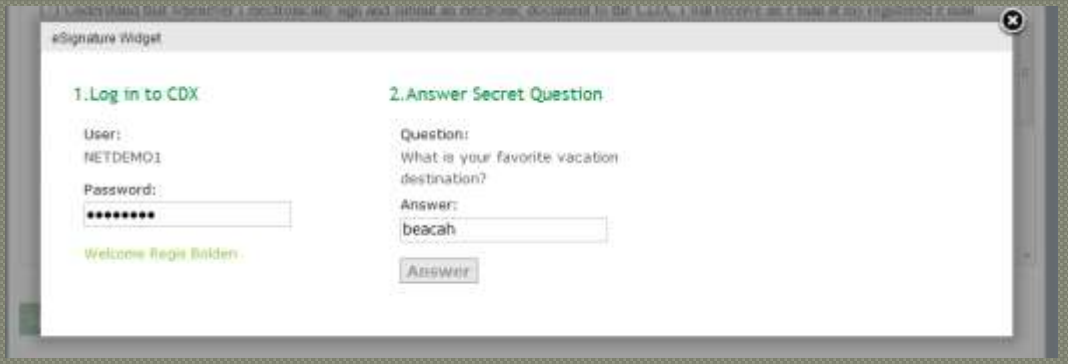


Electronic Signature Agreement

Page: Provide CDX password to re-authenticate

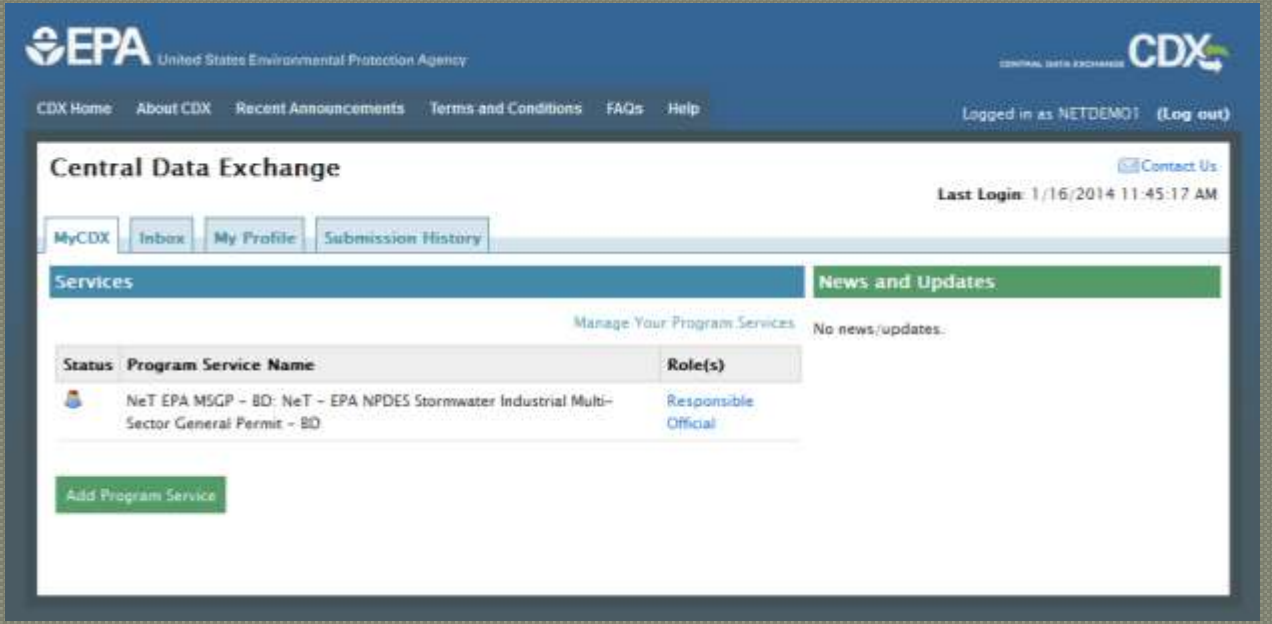
- The user will be prompted to complete the CROMERR signing ceremony re-authenticating, providing one of five (previously chosen) challenge answers, and choosing to sign.

- **NOTE:** The user has three attempts for each password and answer response. If they exceed their password attempts, they should use the password reset. If they exceed their answer attempts, they should contact the CDX Help Desk.



Access NeT MSGP Application

- The user will be redirected back to MyCDX with the ability to access the NeT application.
- If the user did not pass the electronic identity verification process or chose to use the manual process, they will need to be approved by the Regional RMAM before accessing the application.

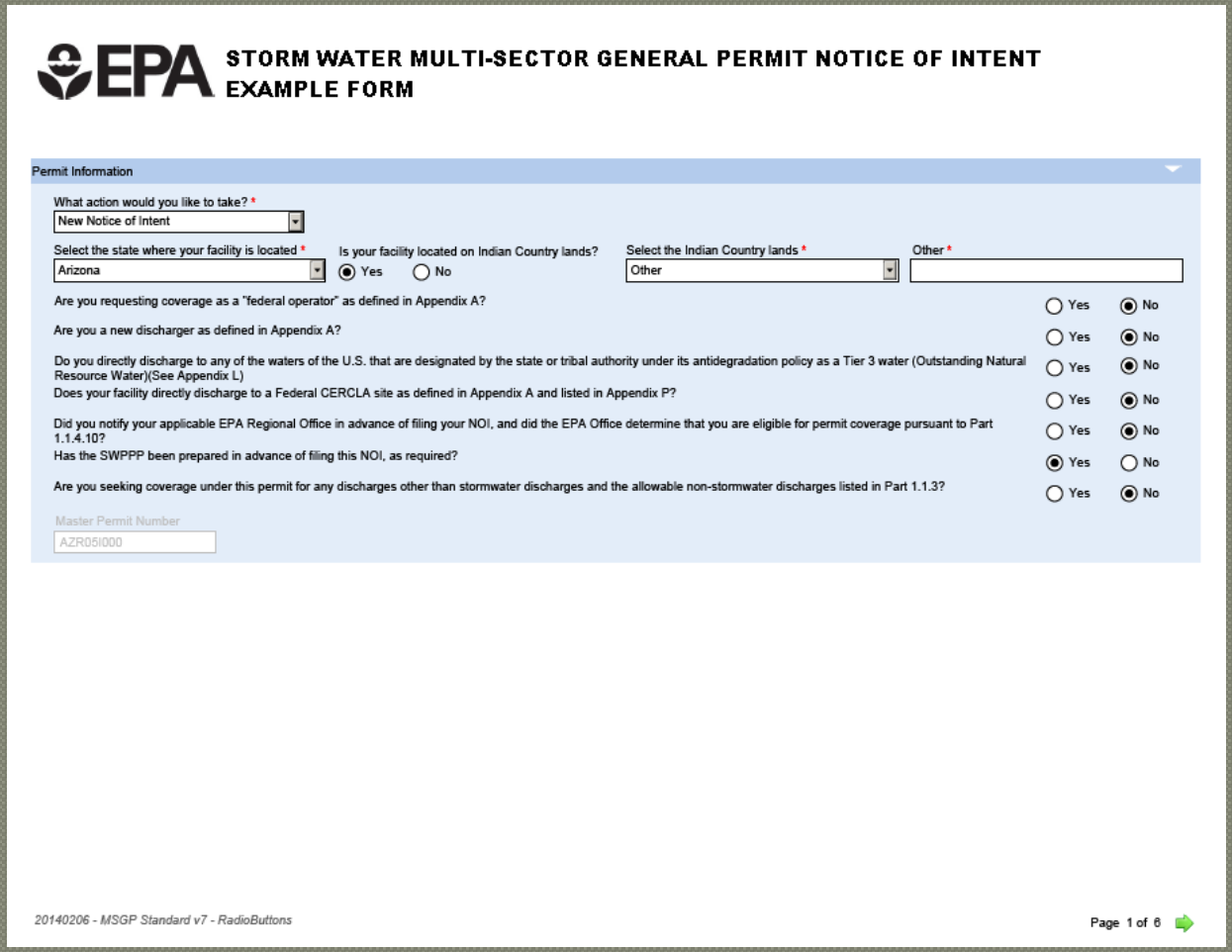


NeT Storm Water Multi-Sector NOI Form

Second Step:

- Preparer, Responsible Official or Certifier selects form in NeT
  - Notice of Intent Form
  - Notice of Termination Form
  - Annual Report
- Preparer selects a Certifier or Responsible Official to sign/submit form
- Certifier or Responsible Official signs form with digital signature under CROMERR and CDX stores Copy of Record
- NeT notifies Regulatory Authorities of submitted NOI forms and allows them to review and approve or deny form with option to automatically approve forms after 90 days
- NOT and Annual Report forms are automatically approved

NeT Storm Water Multi-Sector NOI Form



EPA STORM WATER MULTI-SECTOR GENERAL PERMIT NOTICE OF INTENT EXAMPLE FORM

Permit Information

What action would you like to take? *
New Notice of Intent

Select the state where your facility is located *
Arizona

Is your facility located on Indian Country lands?
(•) Yes ( ) No

Select the Indian Country lands *
Other

Other *

Are you requesting coverage as a "federal operator" as defined in Appendix A?	( ) Yes	(•) No
Are you a new discharger as defined in Appendix A?	( ) Yes	(•) No
Do you directly discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 3 water (Outstanding Natural Resource Water)(See Appendix L)	( ) Yes	(•) No
Does your facility directly discharge to a Federal CERCLA site as defined in Appendix A and listed in Appendix P?	( ) Yes	(•) No
Did you notify your applicable EPA Regional Office in advance of filing your NOI, and did the EPA Office determine that you are eligible for permit coverage pursuant to Part 1.1.4.10?	( ) Yes	(•) No
Has the SWPPP been prepared in advance of filing this NOI, as required?	(•) Yes	( ) No
Are you seeking coverage under this permit for any discharges other than stormwater discharges and the allowable non-stormwater discharges listed in Part 1.1.3?	( ) Yes	(•) No

Master Permit Number
AZR05I000

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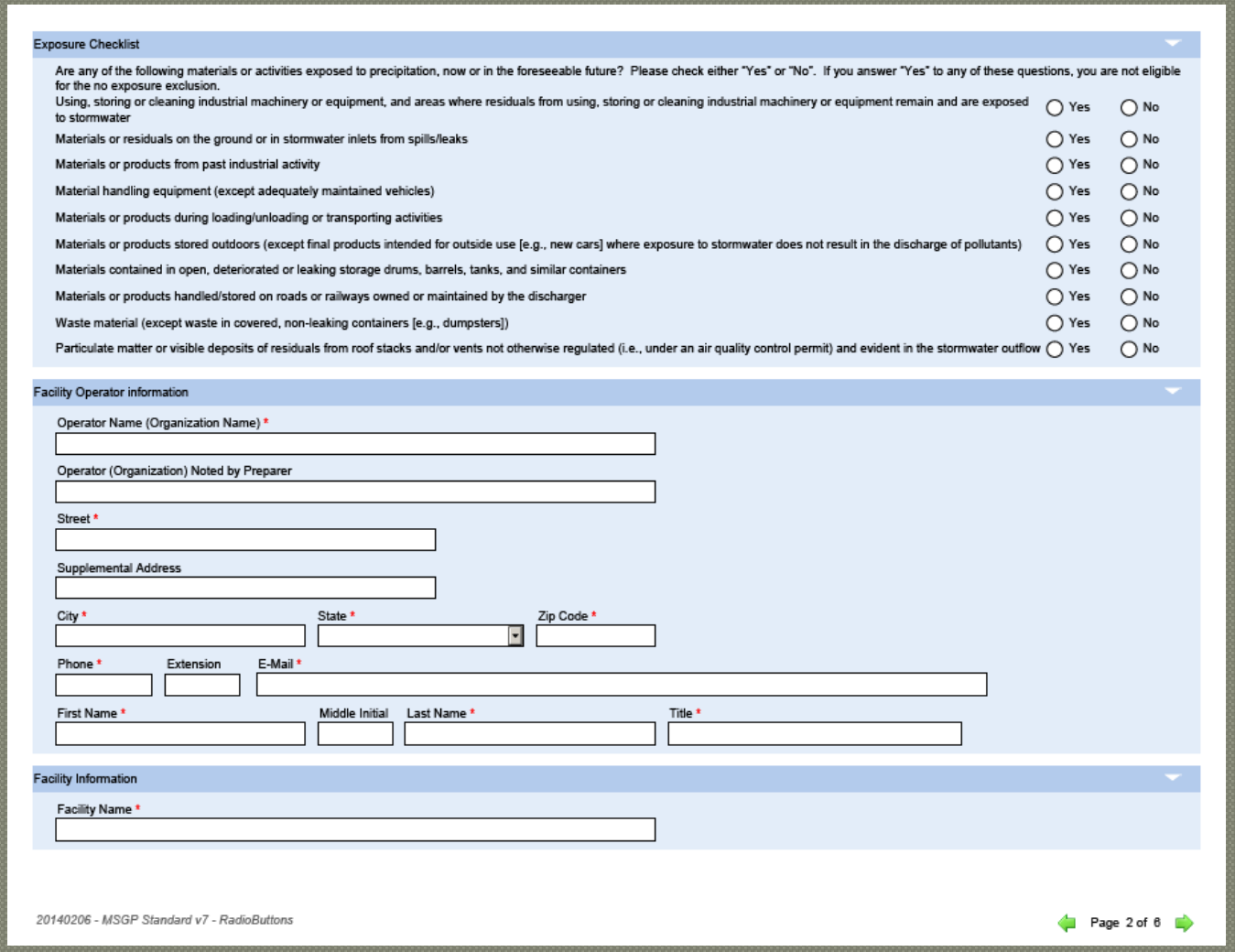
NeT Storm Water Multi-Sector NOI Form



Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? Please check either "Yes" or "No". If you answer "Yes" to any of these questions, you are not eligible for the no exposure exclusion.

Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to stormwater	◯ Yes	◯ No
Materials or residuals on the ground or in stormwater inlets from spills/leaks	◯ Yes	◯ No
Materials or products from past industrial activity	◯ Yes	◯ No
Material handling equipment (except adequately maintained vehicles)	◯ Yes	◯ No
Materials or products during loading/unloading or transporting activities	◯ Yes	◯ No
Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to stormwater does not result in the discharge of pollutants)	◯ Yes	◯ No
Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers	◯ Yes	◯ No
Materials or products handled/stored on roads or railways owned or maintained by the discharger	◯ Yes	◯ No
Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])	◯ Yes	◯ No
Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow	◯ Yes	◯ No

Facility Operator information

Operator Name (Organization Name) *

Operator (Organization) Noted by Preparer

Street *

Supplemental Address

City * | State * | Zip Code *

Phone * | Extension | E-Mail *

First Name * | Middle Initial | Last Name * | Title *

Facility Information

Facility Name *

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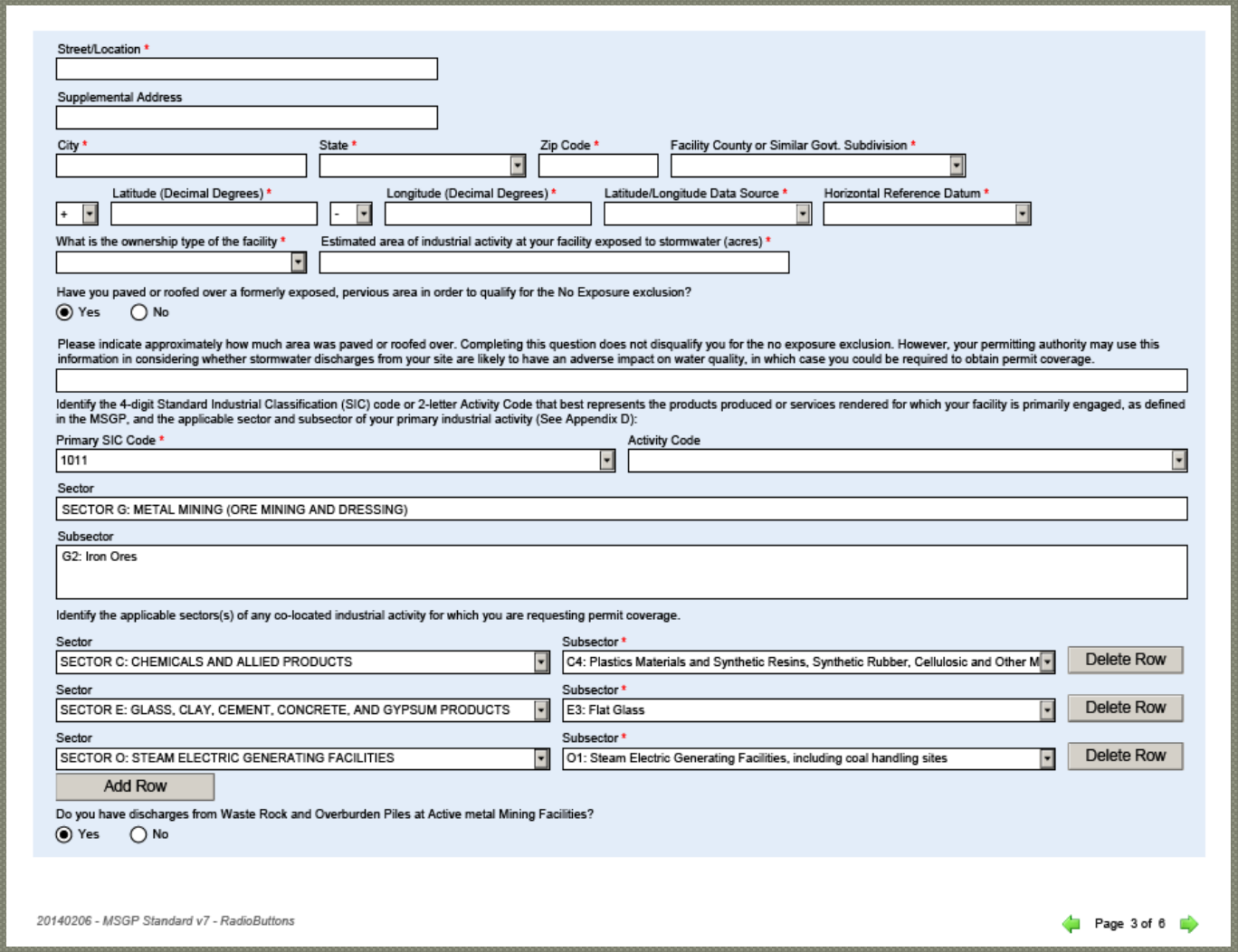
NeT Storm Water Multi-Sector NOI Form



Street/Location *

Supplemental Address

City * | State * | Zip Code * | Facility County or Similar Govt. Subdivision *

Latitude (Decimal Degrees) * | Longitude (Decimal Degrees) * | Latitude/Longitude Data Source * | Horizontal Reference Datum *

What is the ownership type of the facility * | Estimated area of industrial activity at your facility exposed to stormwater (acres) *

Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the No Exposure exclusion?

(•) Yes ( ) No

Please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion. However, your permitting authority may use this information in considering whether stormwater discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage.

Identify the 4-digit Standard Industrial Classification (SIC) code or 2-letter Activity Code that best represents the products produced or services rendered for which your facility is primarily engaged, as defined in the MSGP, and the applicable sector and subsector of your primary industrial activity (See Appendix D):

Primary SIC Code * : 1011 | Activity Code

Sector: SECTOR G: METAL MINING (ORE MINING AND DRESSING)

Subsector: G2: Iron Ores

Identify the applicable sectors(s) of any co-located industrial activity for which you are requesting permit coverage.

Sector	Subsector *	
SECTOR C: CHEMICALS AND ALLIED PRODUCTS	C4: Plastics Materials and Synthetic Resins, Synthetic Rubber, Cellulosic and Other M	Delete Row
SECTOR E: GLASS, CLAY, CEMENT, CONCRETE, AND GYPSUM PRODUCTS	E3: Flat Glass	Delete Row
SECTOR O: STEAM ELECTRIC GENERATING FACILITIES	O1: Steam Electric Generating Facilities, including coal handling sites	Delete Row

Add Row

Do you have discharges from Waste Rock and Overburden Piles at Active metal Mining Facilities?

(•) Yes ( ) No

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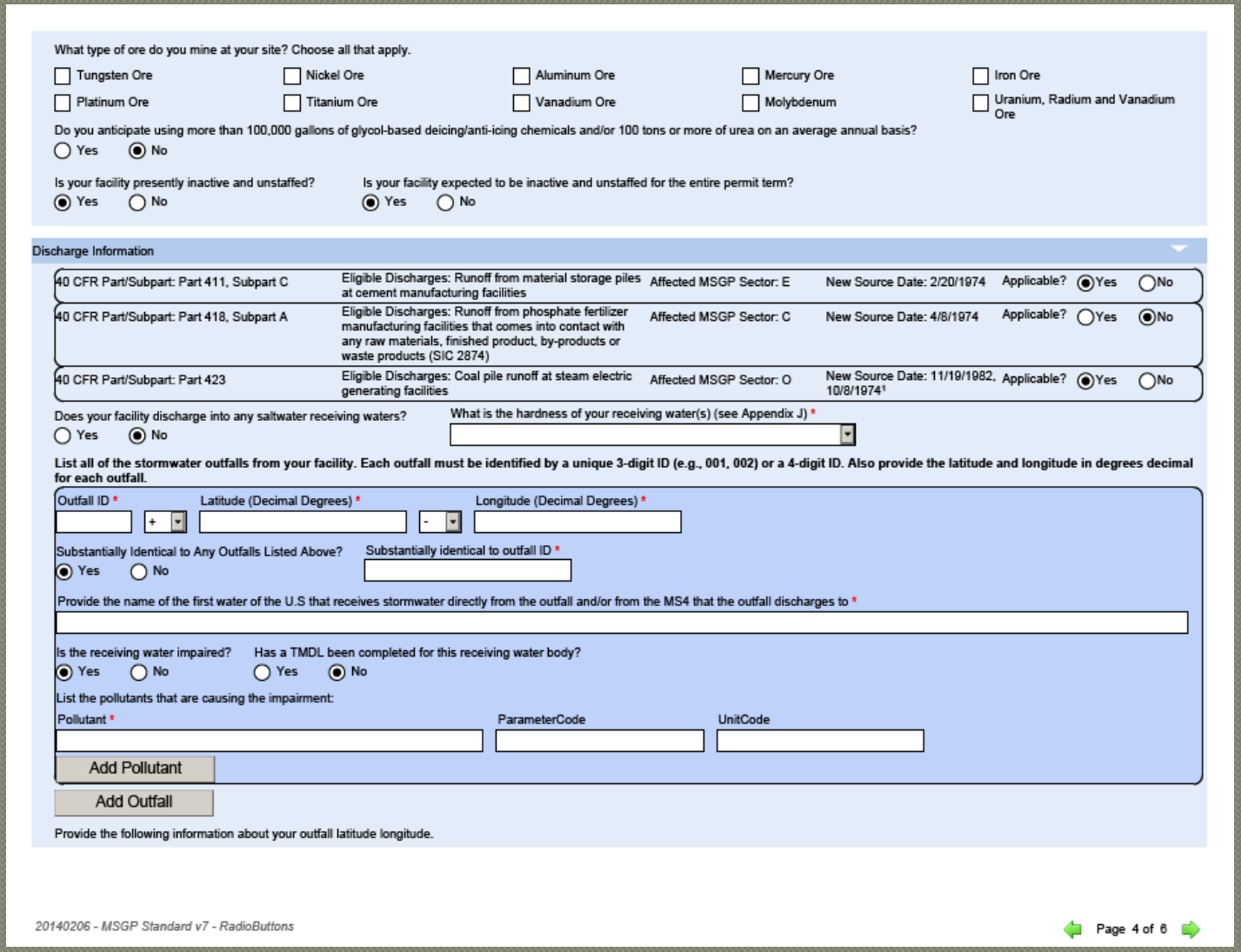
NeT Storm Water Multi-Sector NOI Form



What type of ore do you mine at your site? Choose all that apply.

☐ Tungsten Ore ☐ Nickel Ore ☐ Aluminum Ore ☐ Mercury Ore ☐ Iron Ore

☐ Platinum Ore ☐ Titanium Ore ☐ Vanadium Ore ☐ Molybdenum ☐ Uranium, Radium and Vanadium Ore

Do you anticipate using more than 100,000 gallons of glycol-based deicing/anti-icing chemicals and/or 100 tons or more of urea on an average annual basis?

○ Yes ◉ No

Is your facility presently inactive and unstaffed? ◉ Yes ○ No

Is your facility expected to be inactive and unstaffed for the entire permit term? ◉ Yes ○ No

Discharge Information

40 CFR Part/Subpart: Part 411, Subpart C	Eligible Discharges: Runoff from material storage piles at cement manufacturing facilities	Affected MSGP Sector: E	New Source Date: 2/20/1974	Applicable?	◉ Yes ○ No
40 CFR Part/Subpart: Part 418, Subpart A	Eligible Discharges: Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	Affected MSGP Sector: C	New Source Date: 4/8/1974	Applicable?	○ Yes ◉ No
40 CFR Part/Subpart: Part 423	Eligible Discharges: Coal pile runoff at steam electric generating facilities	Affected MSGP Sector: O	New Source Date: 11/19/1982, 10/8/1974[1]	Applicable?	◉ Yes ○ No

Does your facility discharge into any saltwater receiving waters? ○ Yes ◉ No

What is the hardness of your receiving water(s) (see Appendix J) *

List all of the stormwater outfalls from your facility. Each outfall must be identified by a unique 3-digit ID (e.g., 001, 002) or a 4-digit ID. Also provide the latitude and longitude in degrees decimal for each outfall.

Outfall ID * | Latitude (Decimal Degrees) * | Longitude (Decimal Degrees) *

Substantially Identical to Any Outfalls Listed Above? ◉ Yes ○ No

Substantially identical to outfall ID *

Provide the name of the first water of the U.S that receives stormwater directly from the outfall and/or from the MS4 that the outfall discharges to *

Is the receiving water impaired? ◉ Yes ○ No

Has a TMDL been completed for this receiving water body? ○ Yes ◉ No

List the pollutants that are causing the impairment:

Pollutant * | ParameterCode | UnitCode

Add Pollutant

Add Outfall

Provide the following information about your outfall latitude longitude.

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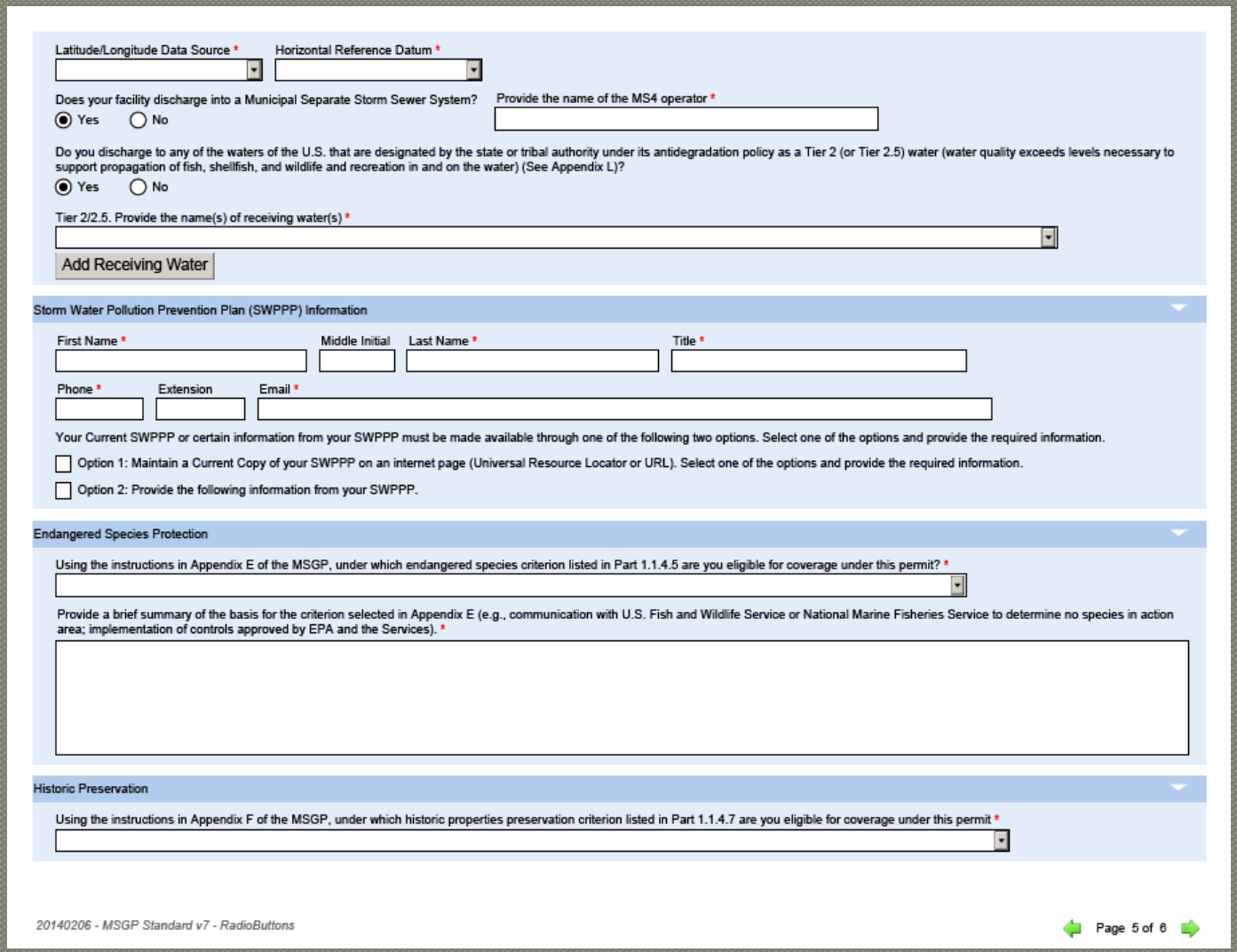
NeT Storm Water Multi-Sector NOI Form



Latitude/Longitude Data Source *

Horizontal Reference Datum *

Does your facility discharge into a Municipal Separate Storm Sewer System?

Yes / No

Provide the name of the MS4 operator *

Do you discharge to any of the waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water) (See Appendix L)?

Yes / No

Tier 2/2.5. Provide the name(s) of receiving water(s) *

Add Receiving Water

Storm Water Pollution Prevention Plan (SWPPP) Information

First Name * | Middle Initial | Last Name * | Title *

Phone * | Extension | Email *

Your Current SWPPP or certain information from your SWPPP must be made available through one of the following two options. Select one of the options and provide the required information.

Option 1: Maintain a Current Copy of your SWPPP on an internet page (Universal Resource Locator or URL). Select one of the options and provide the required information.

Option 2: Provide the following information from your SWPPP.

Endangered Species Protection

Using the instructions in Appendix E of the MSGP, under which endangered species criterion listed in Part 1.1.4.5 are you eligible for coverage under this permit? *

Provide a brief summary of the basis for the criterion selected in Appendix E (e.g., communication with U.S. Fish and Wildlife Service or National Marine Fisheries Service to determine no species in action area; implementation of controls approved by EPA and the Services). *

Historic Preservation

Using the instructions in Appendix F of the MSGP, under which historic properties preservation criterion listed in Part 1.1.4.7 are you eligible for coverage under this permit *

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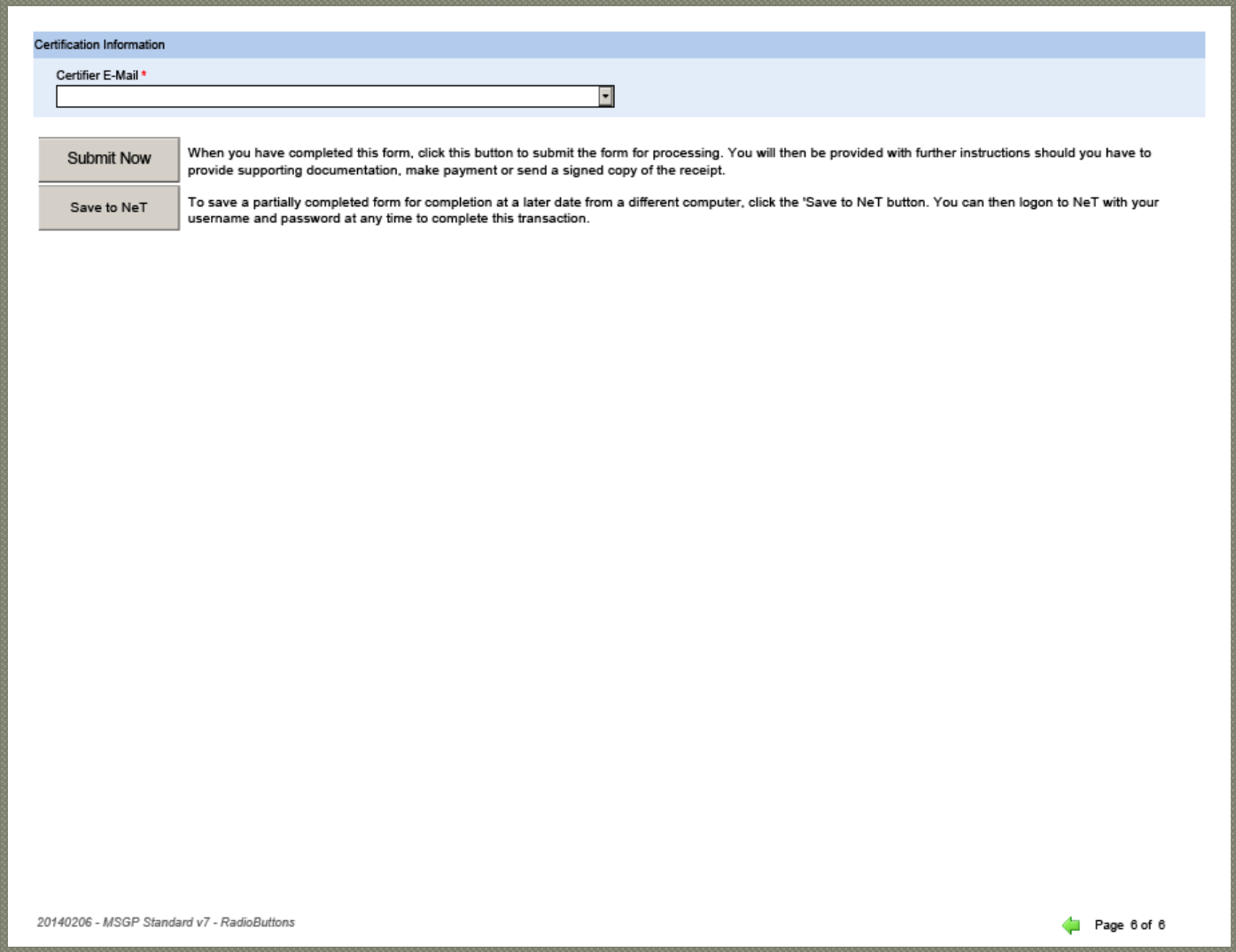
NeT Storm Water Multi-Sector NOI Form



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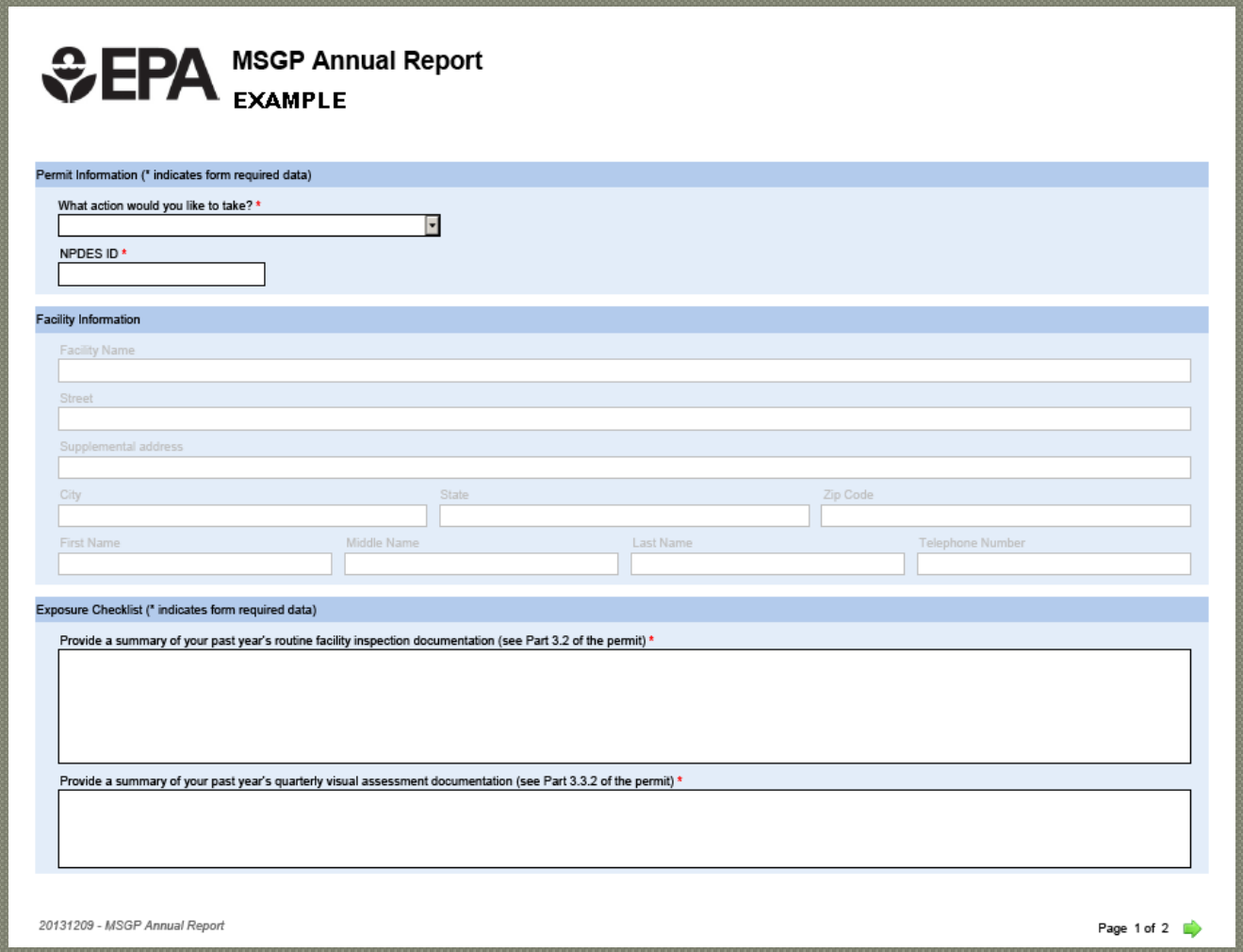

EPA MSGP Annual Report
EXAMPLE

Permit Information (* indicates form required data)

What action would you like to take? *

NPDES ID *

Facility Information

Facility Name

Street

Supplemental address

City | State | Zip Code

First Name | Middle Name | Last Name | Telephone Number

Exposure Checklist (* indicates form required data)

Provide a summary of your past year's routine facility inspection documentation (see Part 3.2 of the permit) *

Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.3.2 of the permit) *

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NeT Storm Water Multi-Sector NOI Form

If, after finding the average of your four monitoring values for any pollutant exceeds the benchmark, you decide no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit) *

Provide a summary of your past year's corrective action documentation (See Part 4.3 of the permit). Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s) *

Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certifier E-Mail *

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, make payment or send a signed copy of the receipt.

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. You can then logon to NeT with your username and password at any time to complete this transaction.

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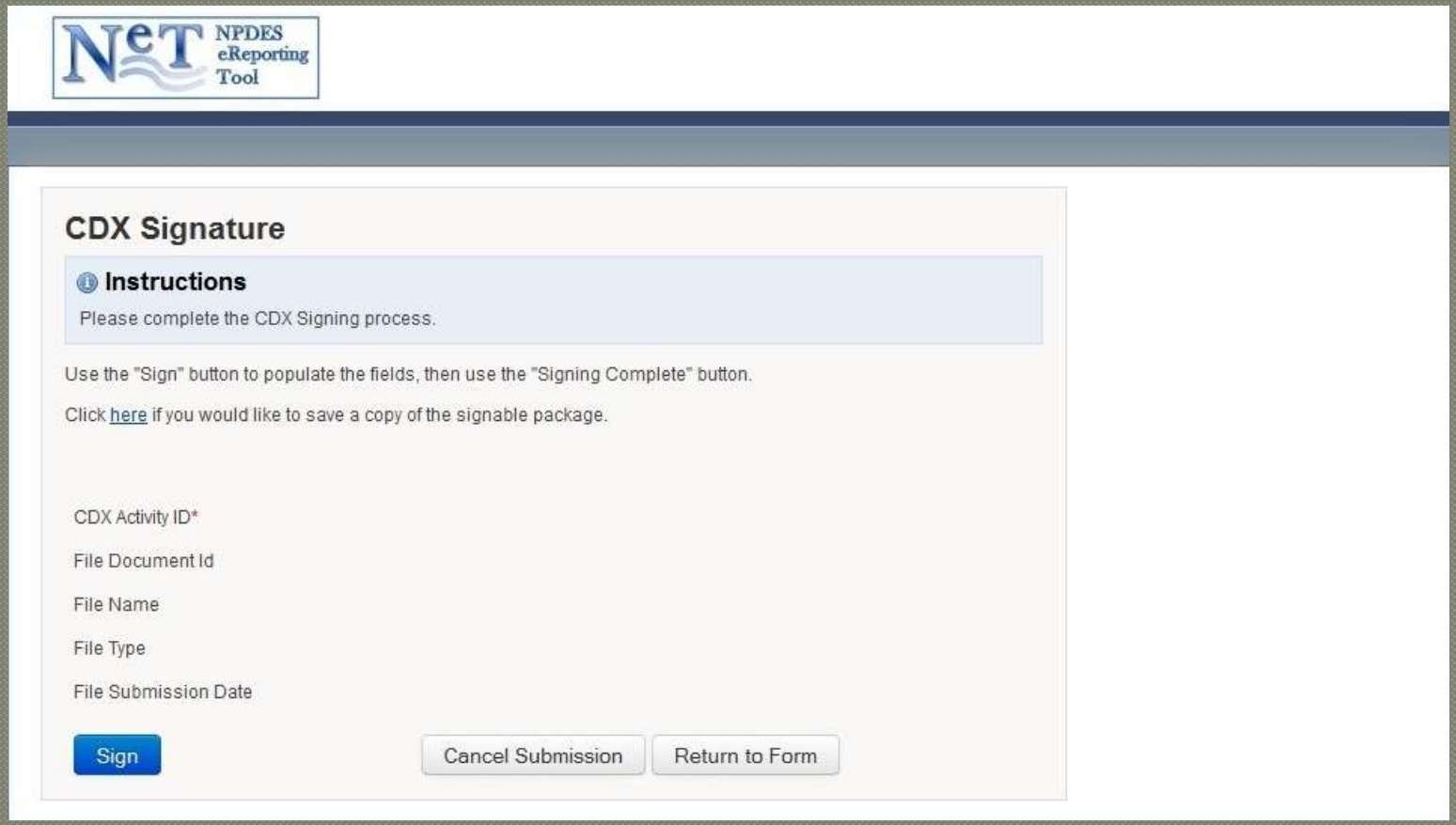
NeT Storm Water Multi-Sector NOI Form



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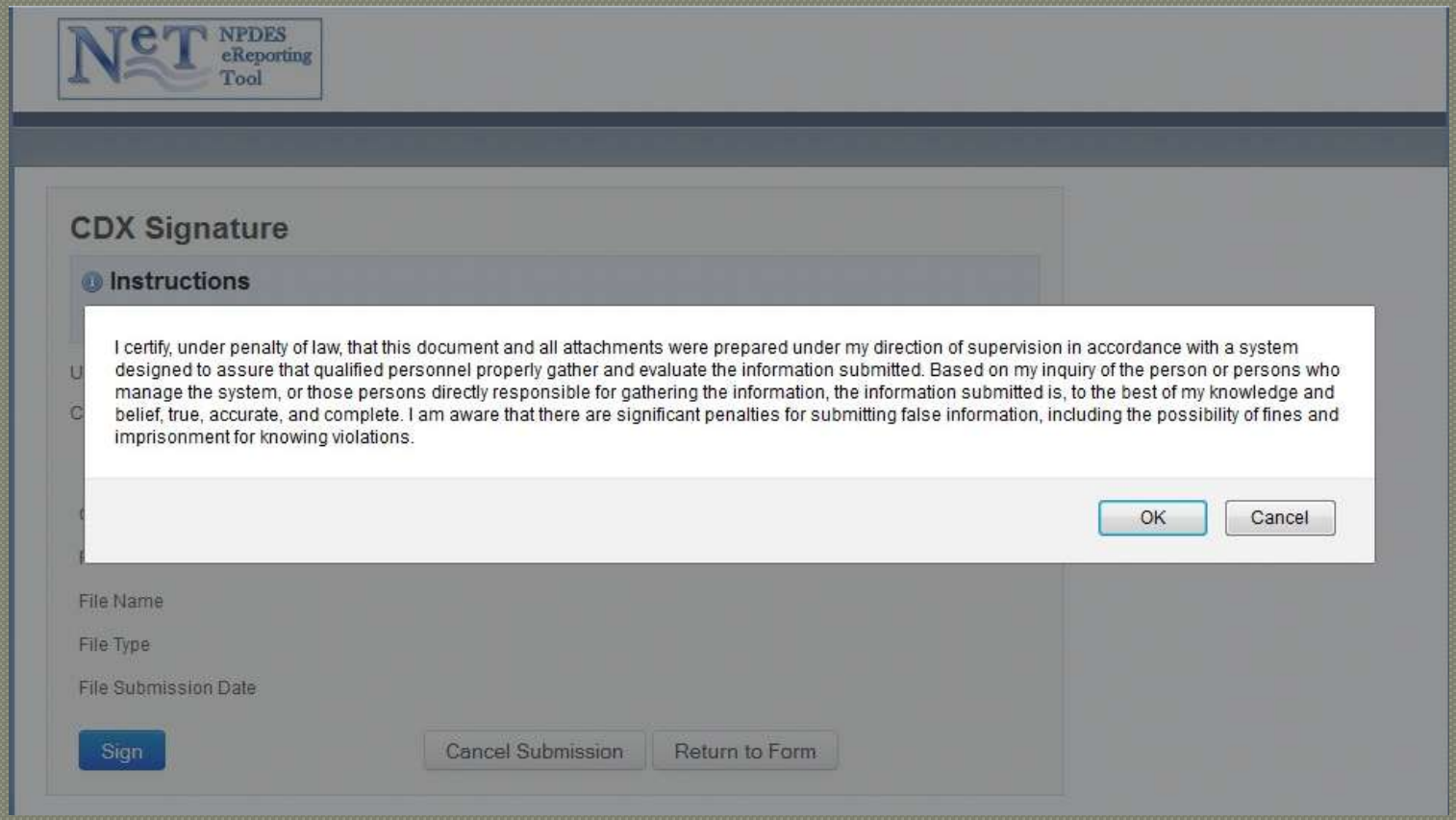

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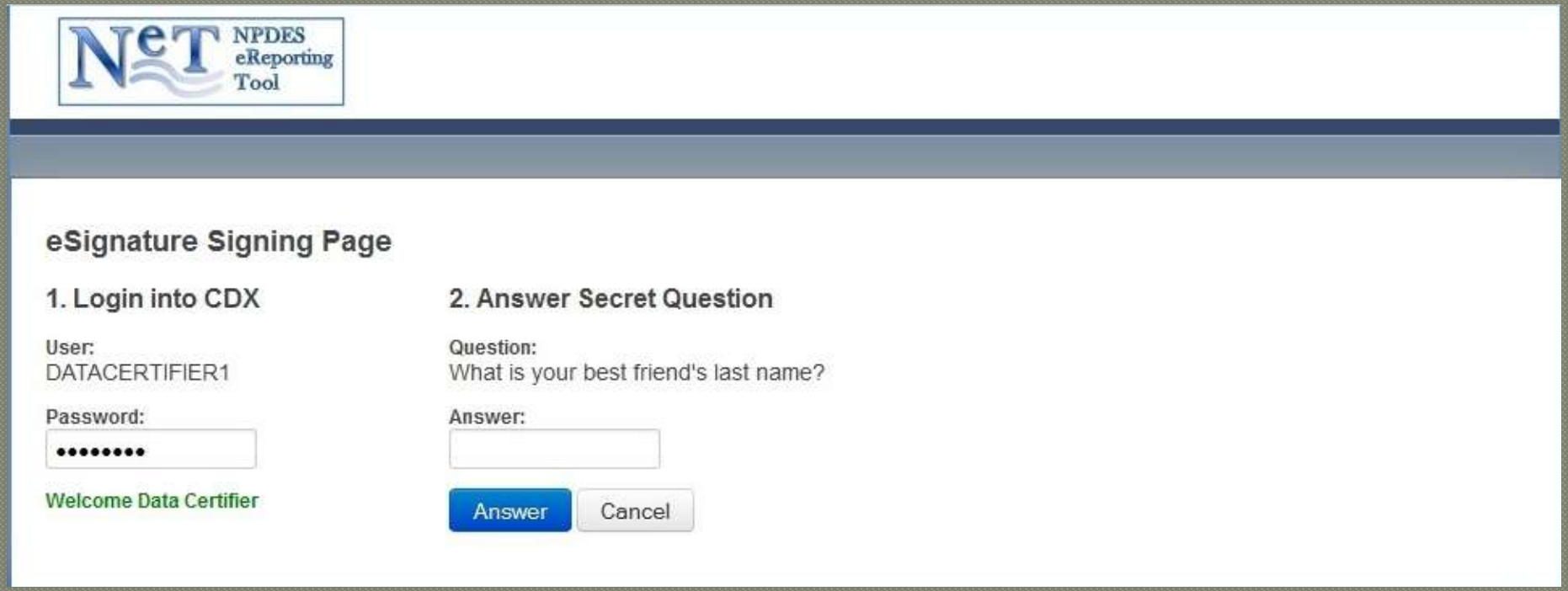

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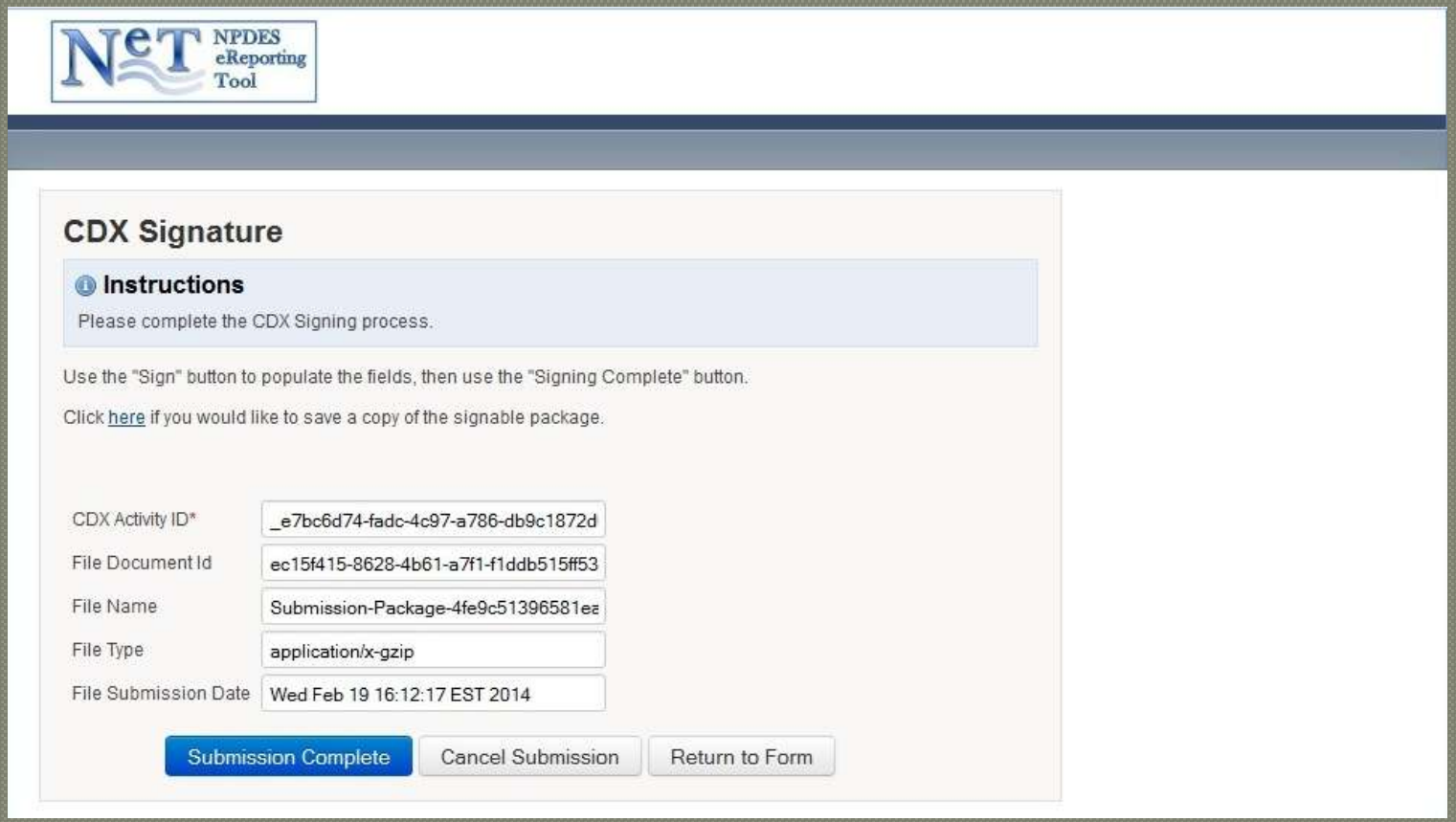

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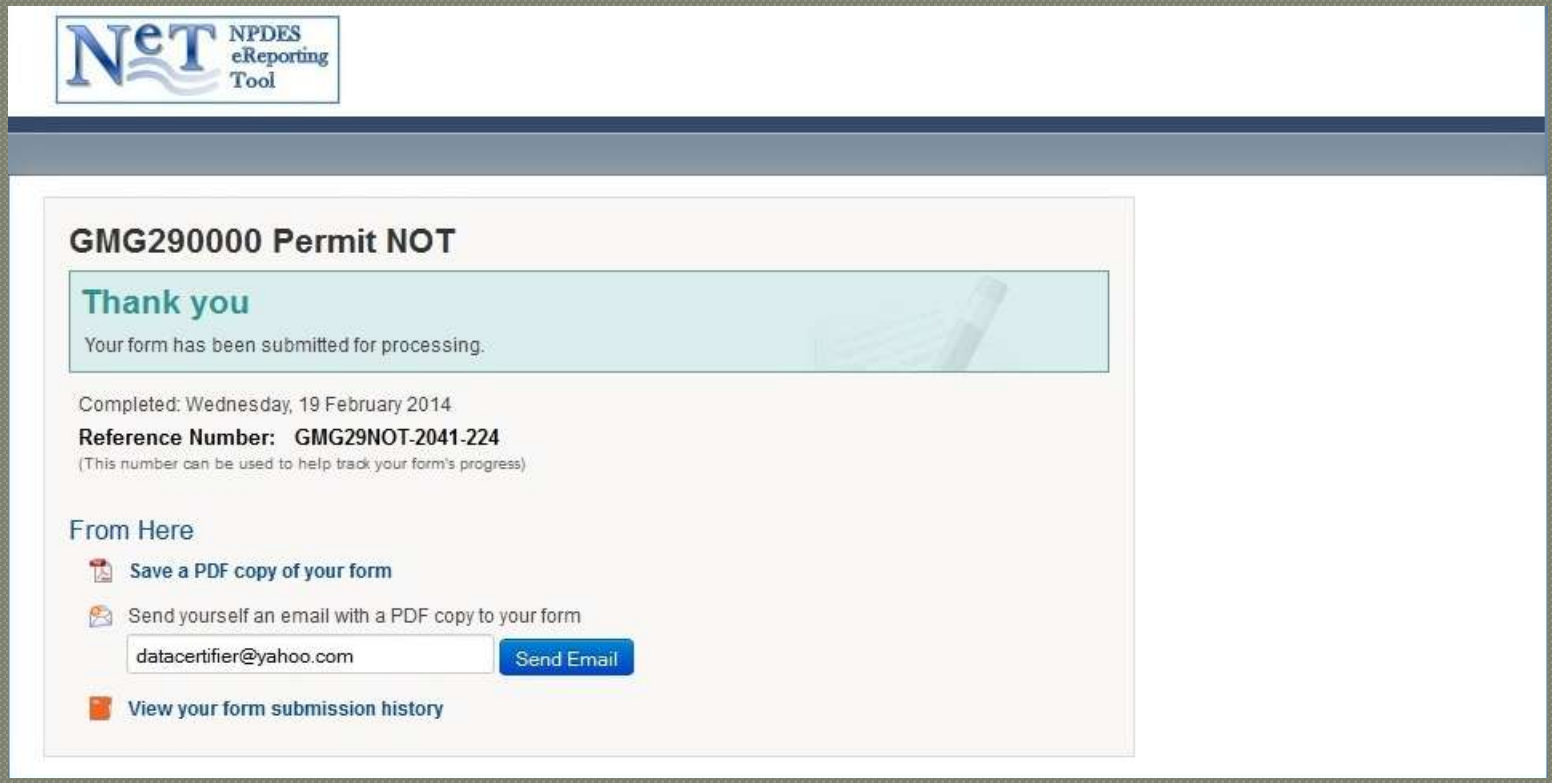

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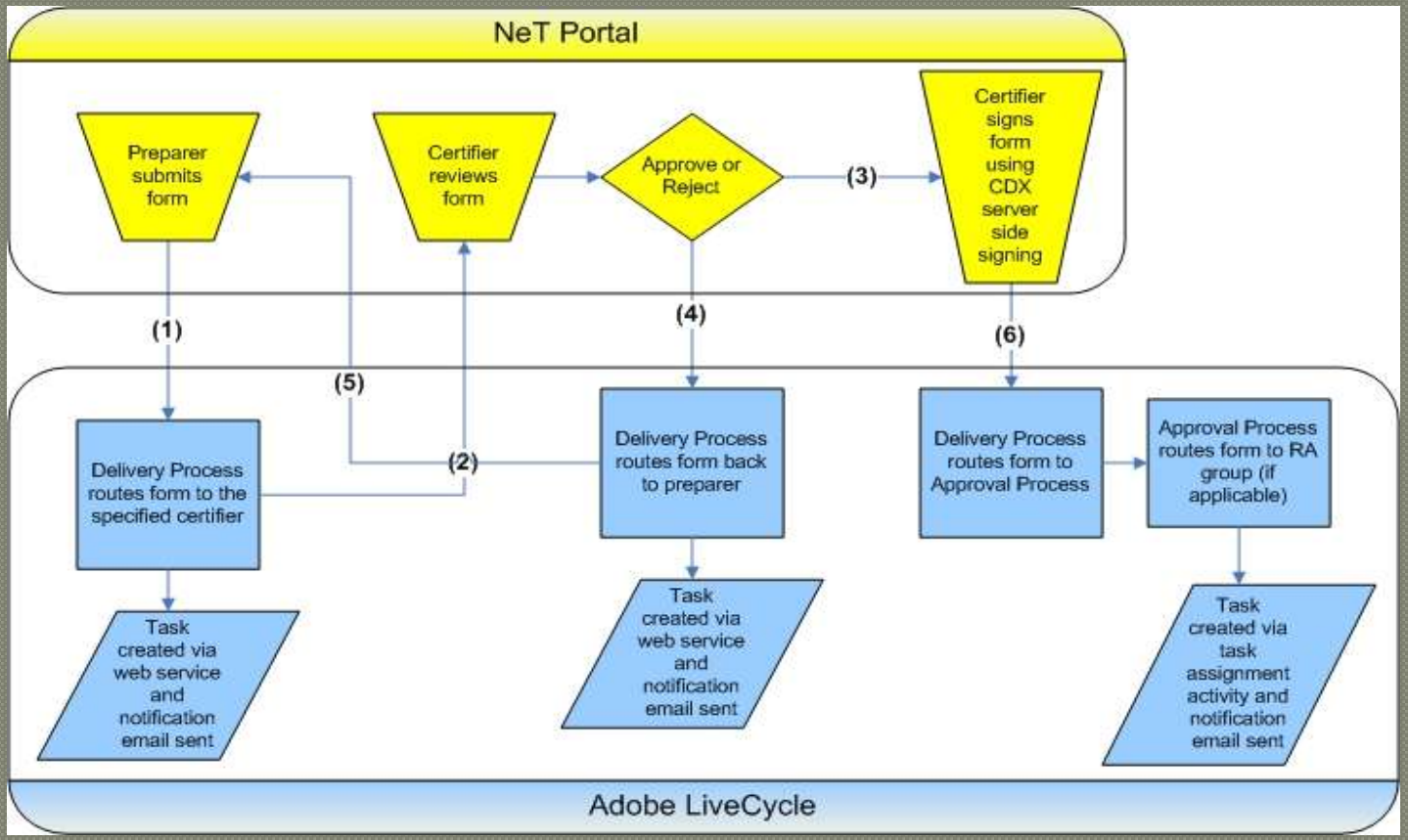

NeT Storm Water Multi-Sector NOI Form

Third Step:

- NeT submits forms to ICIS-NPDES for processing
  - Notice of Intent – saved as a new or changed permit
  - Notice of Termination Form – terminates an existing permit
  - Annual Report – saved as a new or changed permit
- ICIS-NPDES reports the results of processing back to NeT
- Email notifications of approval, disapproval and submission sent to Preparers, Certifiers, Responsible Officials and Regulatory Authorities
- Copy of Record can be viewed in or downloaded from CDX

Presentation Outline

- NeT Overview
- NeT Storm Water Multi-Sector NOI Form
- **NeT Implementation Plan**

NeT Implementation Plan

- Priority Based Upon Agency Type and Data Category:
  1. EPA Regional General Permits
  2. State NPDES Permits
  3. Special Regulatory Program Reports

- Timing Based Upon Resource Availability and Stipulations from the Finalized NPDES Electronic Reporting Rule

NeT Contact Information

- NPDES Electronic Reporting Rule
  - John Dombrowski Dombrowski.John@epa.gov
- NeT Technical Lead
  - Alison Kittle Kittle.Alison@epa.gov
- Region 6 Offshore Oil & Gas Permit Authority
  - Helen Nguyen Nguyen.Helen@epa.gov
- CROMERR
  - Jonathan Jacobson Jacobson.Jonathan@epa.gov

Questions

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