

ANNUAL REPORT OVERVIEW

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NPDES
ELECTRONIC
REPORTING
RULE
40 CFR 127

- **Phase 1** – 21 DEC 2016 compliance deadline
 - Discharge monitoring Reports (DMRs)
 - Biosolids Reports
- **Phase 2** – 21 dec 2020 => **21 Dec 2025 deadline**
 - General Permits
 - CAFO annual Program Reports
 - Ms4 [municipal stormwater] reports
 - **Pretreatment** annual reports and SIUs where EPA or states are control authorities
 - Combined sewer overflow and bypass reports
 - 316(b) [cooling water intake] reports
- **EPA is currently developing Phase 2 e-reporting tools and systems:**
 - Data entry Technical papers: <https://www.epa.gov/compliance/data-entry-guidance-and-technical-papers>.

Annual Pretreatment Report
Electronical Format

March 1, 2025

This is happening.....



FUTURE: Improved Oversight and Transparency for the Pretreatment Program

- Full implementation of the final rule will allow states, EPA, and the public to more readily answer the following questions (and more!):

Number and names of

- POTWs with approved pretreatment programs;
- Industrial users (IUs) in cities without pretreatment programs inspected or sampled during a time period (not just as part of audits);
- SIUs & CIUs in approved pretreatment programs and number without control mechanisms
- IUs in cities without pretreatment programs that are in compliance/not in compliance with their monitoring/reporting requirements;
- SIUs discharging to POTWs with pretreatment programs that are not inspected or sampled annually by the Control Authority;
- IUs that have been issued enforcement actions including the type of enforcement (SNC publication, AO, APO), who issued it (EPA, state, POTW), and any dollar amounts;
- POTWs that are late in submitting local limits reevaluations.



Overview: EPA is piloting NPDES Phase 2 data sharing.

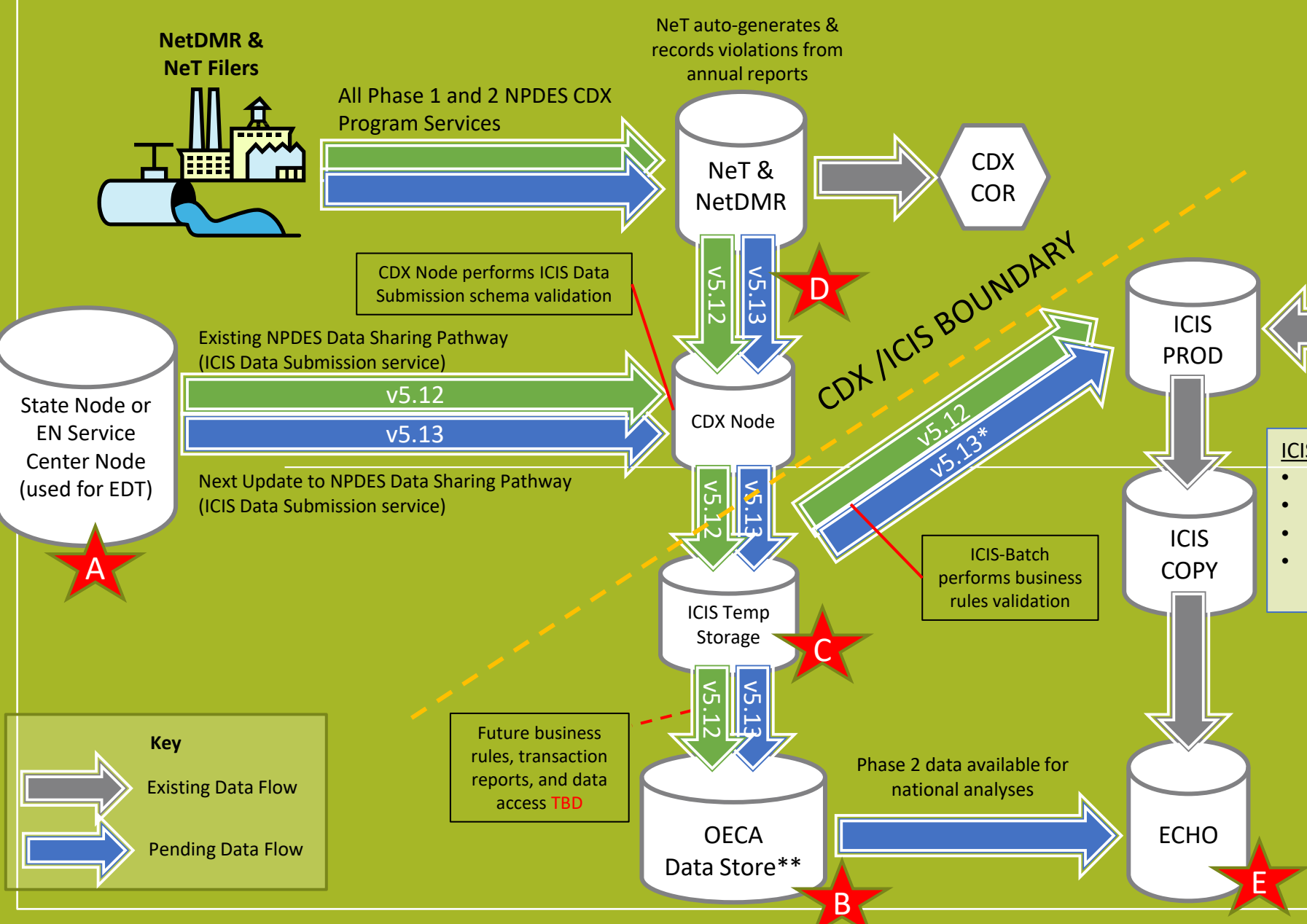
EPA and State Non-EDT Data

- EPA Region and state direct data entry (via web screens) such as permits, inspections, enforcement actions

ICIS Pipeline Capabilities

- Link enforcement actions w/violations
- Link compliance monitoring w/ violations
- Manual RNC detection and resolution of violations
- Used for NNCR, Annual Results, and NPDES SNC NECI Tracking

Additional Notes:
 Payload router sends Phase 2 data to OECA Data Store.
 *Includes all data on v5.12 but not the MS4 Phase 2 data.
 **Not final name & only getting Phase 2 data (e.g., sewer spill and related data).



Key

- Existing Data Flow (grey arrow)
- Pending Data Flow (blue arrow)

Future business rules, transaction reports, and data access **TBD**

Phase 2 data available for national analyses

E-Rule (Part 127):

Overview of Pretreatment Electronic Reporting

- **POTWs with an approved pretreatment programs:** In accordance with 40 CFR 403.12(i), POTWs with an approved pretreatment program are required to submit **annual reports to the Approval Authority** documenting program status and activities performed during the previous year.
- **SIUs & CIUs with State or EPA as Control Authority:** In accordance with 40 CFR 403.12(e) and (h), SIU/CIUs must submit a **report on their compliance status at least semiannually** (once every 6 months).
 - These reports are generally filed in June and December; however, the Control Authority may modify the months in which the reports are to be submitted.
 - There are reduced reporting requirements for Middle-Tier Categorical Industrial Users and Non-Significant Categorical Industrial Users.
- **For BOTH GROUPS above:**
 - These reports are used to evaluate compliance with pretreatment regulations.
 - The NPDES eRule identified the data elements for each program report

E-Rule (Part 127): Data Elements Applicable to Pretreatment Annual Report – 40 CFR 403.12(i)

- SNC Published
- SNC with Pretreatment Enforceable Compliance Schedule Status
- Local Limits Adoption Date
- Local Limits Evaluation Date
- Local Limits Pollutants
- POTW Discharge Contamination Indicator (Program Report)
- POTW Biosolids or Sewage Sludge Contamination Indicator (Program Report)
- Industrial User Control Mechanism Status
- Industrial User POTW Discharge Contamination Indicator (Program Report)
- Industrial User Biosolids or Sewage Sludge Contamination Indicator (Program Report)
- Industrial User Wastewater Flow Rate (Program Report)
- Middle-Tier Significant Industrial User Reduced Reporting Status
- Non-Significant Categorical Industrial User (NSCIU) Certification Submitted to Control Authority
- Notification of Changed Discharge Submission

E-Rule (Part 127): Data Elements Applicable to Pretreatment Annual Report – 40 CFR 403.12(i)

- Number of Industrial User Inspections by Control Authority
- Number of Industrial User Sampling Events by Control Authority
- Number of Required Industrial User Self-Monitoring Events
- Actual Number of Industrial User Self-Monitoring Events
- Types of Industrial User Enforcement Action
- Number of Industrial User Enforcement Actions
- Industrial User Cash Civil Penalty Amount Assessed
- Industrial User Cash Civil Penalty Amount Collected
- Industrial User POTW Discharge Contamination Indicator (Program Report)
- Industrial User Biosolids or Sewage Sludge Contamination Indicator (Program Report)
- Industrial User Wastewater Flow Rate (Program Report)
- Middle-Tier Significant Industrial User Reduced Reporting Status
- Non-Significant Categorical Industrial User (NSCIU) Certification Submitted to Control Authority
- Notification of Changed Discharge Submission

E-Rule (Part 127): Data Elements Applicable to SIU/CIU Compliance Reports – 40 CFR 403.12(e)&(h) (Where State or EPA is Control Authority)

- NPDES ID
- Permitted Feature ID
- Limit Set Designator
- Monitoring Period End Date
- Monitoring Location Code
- Limit Season Number
- Parameter Code
- No Data Indicator (NODI)
- Value
- Quantity or Concentration Units
- Value Received Date (as determined by State or EPA)
- Value Type
- Value Qualifier
- Industrial User Wastewater Flow Rate

Pretreatment Annual Reports - ECHO

Ro01P – Failure to enforce against pass through and/or interference

Ro02P – Failure to submit required report within 30 days of applicable due date

Ro03P – Failure to issue/reissue control mechanisms to at least 90% of SIU/CIUs within 6 months of Significant Industrial User control mechanism expiration

Ro04P – Failure to inspect at least 80% of SIU/CIUs within the past 12month reporting period

Ro05P – Failure to sample at least 80% of SIU/CIUs within the past 12month reporting period

Ro06P – Failure to enforce pretreatment standards, approved local limits, and reporting requirements (more than 15% of Significant Industrial Users in SNC)

Ro07P – Failure of the Control Authority to publish for SNC

<https://test.epacdx.net/>

National Webinar

November 21, 2024

- E-reporting Rule
- CDX Login and NET PPR access
- Pretreatment Annual Report Specifics
- Practical Training from a local Pretreatment Coordinator on NET PPR

Questions