



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

# E-Reporting in Georgia

**Anna Truszczynski, PhD**

**October 2017**



# CLEAN WATER ACT

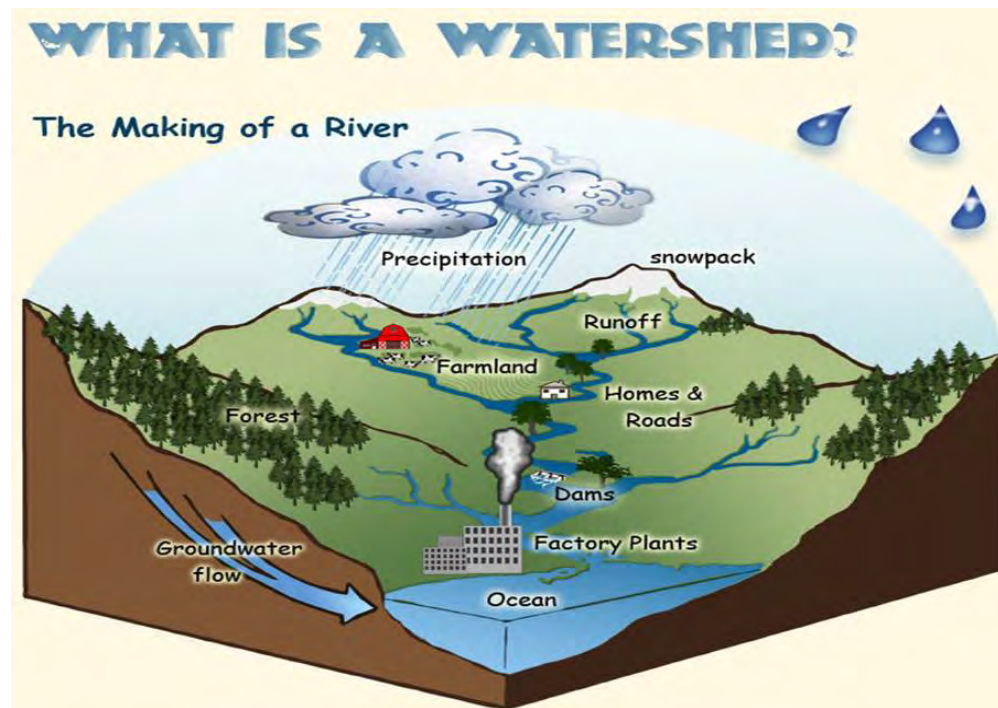
- **National Pollutant Discharge Elimination System (NPDES)**
  - **1972** – Created in Clean Water Act to regulate point sources of pollution
  - Regulated industrial wastewater and municipal sewage
  - Stormwater was not included





# CLEAN WATER ACT

- As industrial wastewater and municipal sewage sources received permits, attention turned to stormwater.

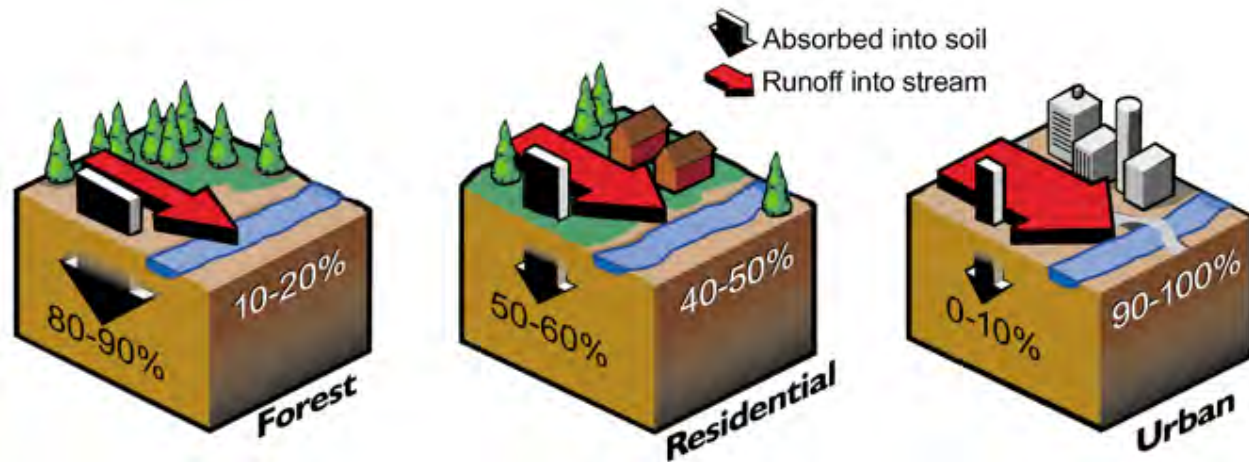






# CLEAN WATER ACT

- EPA completed an extensive study that identified stormwater runoff as the leading cause of water quality problems.
- Urban runoff was highlighted as a major contributor to water quality degradation.





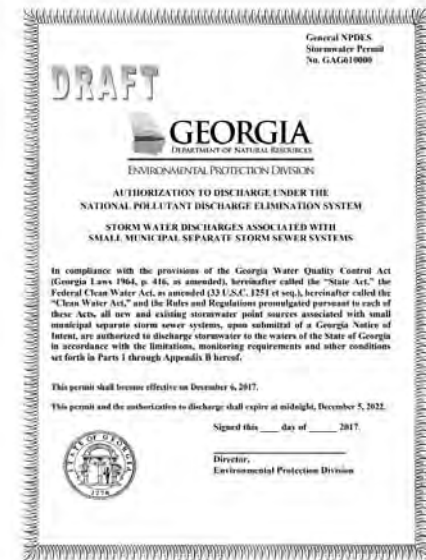
## CLEAN WATER ACT

- **National Pollutant Discharge Elimination System (NPDES)**
  - **1987** – Water Quality Act addresses stormwater
    - Industrial
    - MS4 – Municipal Separate Storm Sewer System
  - **1990** – EPA publishes final Phase I rule for:
    - Large MS4 – pop. greater than 250,000
    - Medium MS4 – pop. between 100,000 and 250,000
  - **1999** – EPA publishes final Phase II rule for:
    - Small MS4 – urban areas with pop. less than 100,000



# CLEAN WATER ACT

- National Pollutant Discharge Elimination System (NPDES)
  - Georgia authorized by EPA to administer the NPDES program
    - Permitting
      - Phase I Large – 45 municipalities
      - Phase I Medium – 12 municipalities
      - Phase II Small – 107 municipalities
      - Phase II also includes GDOT and Dept of Defense
    - Compliance





# GA MS4 REPORTING REQUIREMENTS

- **Stormwater Management Plan**
  - Submitted at the start of new permit cycle or after designation
  - Outlines:
    - BMPs
    - Measurable goals
    - Implementation schedule
    - Responsible parties





# GA MS4 REPORTING REQUIREMENTS

- Annual Reports
  - Submitted each year
  - Summarizes:
    - Activities completed
    - Assessments of BMP effectiveness
    - Proposed changes to SWMP







# GA MS4 REPORTING REQUIREMENTS

- Currently all information is reported using paper forms and electronic appendices (thumb drive, CD)
- Challenges in reviewing:
  - Limited filing space
  - Can be difficult to track year-to-year
  - Lots of data





## IMPETUS FOR E-REPORTING

- Many states and EPA Regions experienced similar issues
- E-reporting rule published October 22, 2015
- Intended to:
  - Increase transparency
  - Improve compliance tracking
  - Improve report reviews
  - Reduce time spent on data management activities



Image by Niklas  
Bildhauer from  
WikiCommons



## IMPLEMENTING E-REPORTING IN GA

- Core permitting and compliance data flowing to EPA portals for all NPDES permits in Georgia
  - Facility/MS4 information
  - Compliance schedules
  - Dates and results of inspections
- All data is going to EPA ECHO at [echo.epa.gov](https://echo.epa.gov)
- What does this mean for MS4 operators?
  - Public can see if your annual reports are late
  - Public can see the results of inspections
  - Get familiar with [echo.epa.gov](https://echo.epa.gov)



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### Facility Summary



HOUSTON COUNTY MS4  
200 CARL VINSON PKWY, WARNER ROBINS, GA 31088  
FRS ID: 110070046023  
EPA Region: 04  
Latitude: 32.59647  
Longitude: -83.66515  
Locational Data Source: FRS  
Industry: No description found  
Indian Country: N



### Enforcement and Compliance Summary

Statute	Insp (5 Years)	Date of Last Inspection	Compliance Status	Qtrs in NC (of 12)	Qtrs in Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CWA	1	04/26/2017	No Violation	0	0	--	--	--	--	--

#### Related Reports

- [CWA Pollutant Loading Report](#)
- [CWA Effluent Charts](#)
- [CWA Effluent Limit Exceedances Report](#)
- [View Envirofacts Reports](#)

[Go To Enforcement/Compliance Details](#)

#### Regulatory Information

Clean Air Act (CAA): No Information  
 Clean Water Act (CWA): Minor, Permit Effective (GAG610055)  
 Resource Conservation and Recovery Act (RCRA): No Information  
 Safe Drinking Water Act (SDWA): No Information

#### Other Regulatory Reports

Air Emissions Inventory (EIS): No Information  
 Greenhouse Gas Emissions (eGGRT): No Information  
 Toxic Releases (TRI): No Information





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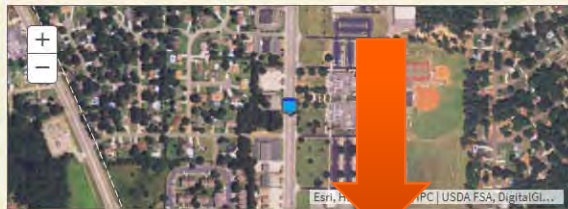
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**Enforcement and Compliance**

**Filter Enforcement and Compliance Information**

Include all statutes (default)
 Restrict information to:
 CAA Only (0)
 CWA Only (1)
 RCRA Only (0)
 SDWA Only (0)

**Compliance Monitoring History (5 years)**

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
CWA	GAG610055	ICP	Audit	State	04/26/2017	

Entries in italics are not considered inspections in official counts.

**Compliance Summary Data**

Statute	Source ID	Current SNC/HPV	Description	Current As Of	Qtrs in NC (of 12)
CWA	GAG610055	No		06/30/2017	0

**Three Year Compliance Status by Quarter**

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13+
CWA (Source ID: GAG610055)		07/01-09/30/14	10/01-12/31/14	01/01-03/31/15	04/01-06/30/15	07/01-09/30/15	10/01-12/31/15	01/01-03/31/16	04/01-06/30/16	07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/22/17
	<b>Facility-Level Status</b>	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	Und
	<b>SNC/RNC History</b>													

**Informal Enforcement Actions (5 Years)**

Statute	System	Source ID	Type of Action	Lead Agency	Date
No data records returned					

**Formal Enforcement Actions (5 Years)**

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
No data records returned						

**ICIS Case History (5 years)**

Primary Law/Section	Case No.	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
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Statute	System	Source ID	Type of Action	Lead Agency	Date
No data records returned					

**Formal Enforcement Actions (5 Years)**

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
No data records returned						

**ICIS Case History (5 years)**

Primary Law/Section	Case No.	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
No data records returned										



# AVAILABLE INFORMATION



### Three Year Compliance Status by Quarter

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2
CWA	(Source ID)	07/01-09/30/14	10/01-12/31/14
Facility-Level Status		No Violation	No Violation
SNC/RNC History			
Permit Schedule Violations			
CWA	Schedule Event achieved late but reported: Compliance Schedule		
CWA	Schedule Event reported late: Compliance Schedule		
CWA	Schedule Event unachieved and not reported: Compliance Schedule		
CWA	Schedule Event unachieved but reported: Compliance Schedule		

QTR 10	QTR 11	QTR 12	QTR 13+ ⓘ
10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/22/17
No Violation	Violation	No Violation	Und
	N(RptViol)	R(Resolvd)	
	02-15-17	05-15-17	
	02-15-17	05-15-17	
	02-15-17	05-15-17	
	02-15-17	05-15-17	

### Informal Enforcement Actions (5 Years)

Statute	System	Source ID	Type of Action	Lead Agency	Date
CWA	ICP	(Source ID)	Notice of Noncompliance Issued	State	07/10/2017



## PART 2 OF E-REPORTING

- Georgia is currently implementing Part 2 of e-reporting
  - Annual reports
  - Data coming from permittee, not EPD

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Georgia EPD Online System

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# LESSONS LEARNED – INDUSTRIAL

- Industrial stormwater e-reporting went live December 2016
  - Optional 2016 annual report submittal
  - Required notice of intent renewals
  - All forms will be received by EPD electronically

GEORGIA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION

Georgia Department of Natural Resources Online Permittals

Home

Submitted Applications Additional Reports

Submittal No: Submittal Status: (All) Submitted Date: 06/01/2017 - 06/30/2017 Permit No.: Site Address: City: County: Facility Name: Permit Issued Only: Category: Permit/License Department: (All) Program: Stormwater App Type: (All) Search

Submitted Applications

1 - 15 of 1686 item(s)

	Facility	App Info.	Type	RO Info.	Review Status
<a href="#">View</a>	3M CARTERSVILLE	54702 - Industrial Stormwater (GAR050000) NOI / NEE App Type:	Stormwater Submitted on: 06/21/2017	RAMON CAPUA 19 Smiley Ingram Rd SE, Cartersville, 30121	Approved
<a href="#">View</a>	400 WASTE & SCRAP	57642 - Industrial Stormwater (GAR050000) NOI / NEE App Type:	Stormwater Submitted on: 06/30/2017	Robert Wallace 63 Day Rd., Dawsonville, 30534	Complete Submittal
<a href="#">View</a>	AAA CONCRETE PRODUCTS CORPORATION	58813 - Industrial Stormwater (GAR050000) NOI / NEE App Type:	Stormwater Submitted on: 06/30/2017	Steve Williams 1224 EAST BROAD AVENUE, ALBANY, 31705	Complete Submittal
<a href="#">View</a>	Aalto Scientific Ltd	53230 - Industrial Stormwater (GAR050000) NOI / NEE App Type:	Stormwater Submitted on: 06/13/2017	Robert Burda 230 Technology Parkway, Eatonton, 31024	Complete Submittal
<a href="#">View</a>	ABF FREIGHT	51460 - Industrial Stormwater (GAR050000) NOI / NEE App Type:	Stormwater Submitted on: 06/14/2017	Mark McMinn 1165 1165 Wilburn Rd, Conley, 30288	Complete Submittal



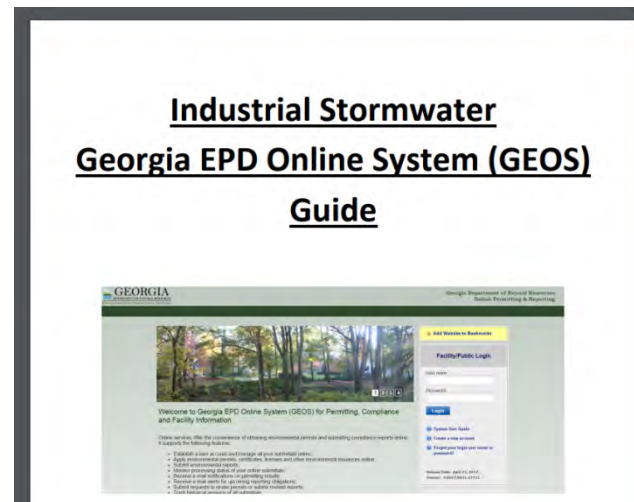
## LESSONS LEARNED – INTERNAL

- **Form creation**
  - Re-evaluate language
  - Look for short-cuts (buttons, check boxes, automatic population)
- **Beta testing**
  - Test the system as a knowledgeable permittee
  - Find coworkers to test as new permittees
  - Seek new ways to “break the system”
  - Document each attempt



# LESSONS LEARNED – EXTERNAL

- User outreach
  - Signatory requirements
  - Help guides
  - Website updates
  - Clear protocol for addressing specific issues





## NEXT STEPS – DATA ELEMENTS

- Identifying one or more unique codes/descriptions, which describe how the permittee will comply with permit components:
  - Public Education
  - Public Involvement
  - Illicit Discharge Detection and Elimination (IDDE)
  - Construction Stormwater Management
  - Post-Construction Stormwater Management
  - Structural Control/Good Housekeeping



## NEXT STEPS – DATA ELEMENTS

- Compliance monitoring activity information, including:
  - MS4 reliance on other government entities
  - Descriptions of permit components and goals
  - Tracking changes to permit components
  - Summary of permittee's compliance and progress, including yes/no code indicating if goal is complete
  - Identify all enforcement actions taken by MS4







## NEXT STEPS – INTEGRATING REMAND RULE

- Remand Rule
  - Published December 2016
  - Response to 2003 case: Environmental Defense Center, et al. v. EPA
  - Court determined that current Phase II MS4 regulations did not:
    - Provide adequate public notice
    - Require permitting authority review of the best management practices to be used at a particular MS4



## NEXT STEPS – INTEGRATING REMAND RULE

- **Remand Rule impact on permitting authorities:**
  - SWMP not enforceable
  - Permitting authorities have 2 options: Comprehensive Permit and Two-Step General Permit
- **Georgia chose Comprehensive Permit**
  - On public notice now
  - Included stakeholder process and meetings with EPA
  - Permit revisions focus on clear, measurable, specific permit components for:
    - Great permit enforceability and clarity
    - More effective e-reporting implementation



## NEXT STEPS – CHALLENGES

- Remand Rule impact on E-reporting:
  - E-reporting rule to be updated to reflect new Phase II requirements
  - Review references to measurable goals, permittee's intended actions
  - Correct initial oversight regarding municipal operations requirements
  - Waiting for updated e-reporting rule with these changes



## NEXT STEPS – CHALLENGES

- Differences in Phase I and Phase II permit components
  - Phase I also requires:
    - Fertilizer, herbicide, and pesticide program
    - Municipal sources program
    - High Visibility Pollutant Source Program
    - Industrial Program
  - These differences not explicitly discussed for e-reporting implementation







## NEXT STEPS

- **Getting MS4 forms on board**
  - Review of documents
    - Internal experts
    - Internal educated non-experts
- **Getting MS4 implementers on board**
  - User outreach
    - Guidance documents, help guides
    - Presentations to groups



## CLOSING

- E-reporting will help permitting authorities:
  - Track compliance
  - Improve efficiency
- Final e-reporting implementation is still in progress
  - Opportunity for feedback
  - Opportunity to improve





# QUESTIONS

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