

NPDES Electronic Reporting Rule Phase 2 Implementation Plan

For Montana Department of Environmental Quality 21 December 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

In this section, give a brief overview of the agency's current data systems and e-reporting capabilities. (Details will be provided elsewhere in this template.) Summarize the key tasks for updating or building the agency's data systems and include estimated timelines. (i.e., Indicate what data you will act as initial recipient, brief description of current or planned eReporting tools, title of executive sponsors and main personnel involved with implementation, current or planned databases and data transfer to EPA capabilities.) This section should provide the primary contact for this IP and the approximate date when the agency expects to successfully implement electronic reporting for Phase 2 data.

DEQ's Water Quality Division Information Management and Technical Services Section enter and maintain all Montana Pollutant Discharge Elimination System (MPDES) permitting data in EPA's Integrated Compliance Information System (ICIS). Currently, permit data is directly entered into ICIS and includes basic facility and permit information, monitoring locations, limit sets, monitoring requirements, and formal enforcement actions. New permitting actions are updated in ICIS within the first monitoring period of the permit or by the permit modification effective date.

Montana is also using EPA’s NetDMR system for electronic DMR submission. As of November 1, 2016, 86% of Montana’s permittees with DMR requirements are either active in NetDMR or will be by the due date for the first monitoring period of their new permit. We are actively working with permittees that are not using NetDMR to bring them into compliance with electronic reporting requirements.

Montana is developing a new information management system named “Fees, Applications, and Compliance Tracking System” (FACTS), which will provide functionality for permittees to prepare and submit permit applications and renewals electronically through an on-line permit wizard and permittee dashboard. The permittee dashboard will provide a user with functionality to manage organizations (permitted entities) that they are authorized for, communicate with DEQ permit writers, submit documents and reports, and pay associated permit fees. Identify proofing and validation will be managed using EPA’s Shared CROMERR Services with minor modifications (i.e., page branding).

DEQ personnel (permit writers, data managers, compliance inspectors, and program managers) will interact with the FACTS system using web-based dashboards facilitating application (NOI) review, permit development and issuance, communication with permittee, permit coding, and compliance inspection reporting. All data elements required by 40 CFR Part 127 Appendix A will be submitted to EPA’s ICIS-NPDES database using the Exchange Network NPDES data flow, with the exception of permit holders that have requested and received an electronic reporting waiver (see section 7 below). For reporting elements that DEQ receives in hard-copy, staff will enter those reporting elements directly into the EPA ICIS-NPDES database. For this reason, we will maintain the ability for direct data entry.

DEQ personnel involved in the development of our new data management system are:

Project Position	DEQ Position
Executive Sponsor	Deputy Director - DEQ
Program Sponsor	Administrator - Water Quality Division
Project Lead	Manager - Information Management & Technical Services Section
Project Manager	Systems Analyst - Information Management & Technical Services Section
Project Advisor	Senior Systems Analyst - Information Management & Technical Services Section
Product Owner	Chief - Water Protection Bureau
Product Owner	FACTS DBA - Information Management & Technical Services Section
Product Owner	Manager - Water Quality Discharge Permit Section
Product Owner	Manager - Compliance, Training, & Technical Assistance Section

Agency Contact for Implementation Plan:

Michael Pipp, Program Manager
 Information Management & Technical Services
 Clean Water Act Programs
 Water Quality Division
 406.444.7424
 mpipp@mt.gov

Estimated Date for Phase 2 Reporting:

NetDMR (>90% compliance):	May 2017
Facility and Permit Data:	December 2018
Compliance Data (Reports):	December 2018
Enforcement Data:	December 2018

2. Agency NPDES Universe

This section is a "snapshot" in time and should include a date of when these numbers were calculated. Provide the names of your NPDES individual and master general permits (MGP) and counts of general permit authorizations for each MGP currently under the jurisdiction of your agency. Please also indicate the number of permits that are currently not in EPA's ICIS-NPDES database. Please mention anticipated large changes in these numbers (new or terminating MGPs). If you wish, electronic reporting counts or percentages may also be included in this section. The following list is for example purposes only and you should group your permits as you wish.

As of November 2016:

- A. Number of Active and Administratively Continued Major Individual MPDES Permits (MT00):
 - a. 33 major permits: 8 administratively continued and 25 effective permits.
 - b. All permits are required to submit DMRs
 - c. All major individual permits enter DMR data into NetDMR.
- B. Number of Active and Administratively Continued Minor Individual MPDES Permits (MT00):
 - a. 123 minor permits: 40 administratively continued and 83 effective permits
 - b. All permits are required to submit DMRs.
 - c. All minor individual permits are using NetDMR.
 - d. All active permits with monitoring requirements have been entered into ICIS.
 - e. All NOI's received have been entered into ICIS and are in a pending.
- C. Number of Active and Administratively Continued MS4 Permits:
 - a. 12 MS4 permits: 1 administratively continued and 11 effective
 - b. All are required to submit semiannual DMRs
 - c. 3 are using NetDMR; remaining permittees have been contacted
- D. Count of Agency Permits not in ICIS-NPDES, by permit type:
 - a. MTB00000 (318 Authorizations): 170 permits
 - b. MT401000 (401 Authorizations): 39 permits
- E. List of Agency General MPDES Permits with number of authorizations for each:
 - a. MTG07000 Construction Dewatering General Permit
 - 1. 33 permits: 32 effective; 1 pending
 - 2. All permits are required to submit DMRs.
 - 3. 16 are using NetDMR; remaining permittees have been contacted
 - b. MTG130000 Concentrated Aquatic Animal Production General Permit
 - 1. 15 permits: 14 effective; 1 pending.
 - 2. All are required to submit semi-annual DMRs.
 - 3. 8 are using NetDMR; remaining permittees have been contacted
 - c. MTG310000 Produced Water General Permit
 - 1. 29 permits: 25 effective; 2 administratively continued; 2 pending
 - 2. All permits are required to submit DMRs.
 - 3. 11 are using NetDMR; remaining permittees have been contacted

- d. MTG370000 Portable Suction Dredging General Permit
 - 1. 29 permits: 24 effective; 1 administratively continued; 4 pending
 - 2. Portable Suction Dredge permits do not have DMR requirements.
- e. MTG490000 Sand and Gravel Operations General Permit
 - 1. 17 permits 16 effective; 1 pending
 - 2. All are required to submit DMRs.
 - 3. 12 are using NetDMR; remaining permittees have been contacted
- f. MTG580000 Domestic Sewage Treatment Lagoons General Permit
 - 1. 26 permits: 26 effective.
 - 2. All are required to submit DMRs
 - 3. 25 are using NetDMR; remaining permittees have been contacted
 - a. 1 has been granted a temporary waiver
- g. MTG770000 Disinfected Water and Hydrostatic Testing General Permit
 - 1. 14 permits: 12 effective; 2 administratively continued
 - 2. All are required to submit DMRs
 - 3. 12 are using NetDMR: remaining permittees have been contacted
- h. MTG790000 Petroleum Cleanup General Permit
 - 1. 2 permits: 2 effective permits
 - 2. All permits required to submit DMRs
 - 3. 1 is using NetDMR; the other permittee has been contacted
- i. MTG870000 Pesticide Application General Permit
 - 1. 70 permits: 17 effective; 53 administratively continued
 - 2. Pesticide Application General Permits do not have DMR requirements
- j. MTG010000 Concentrated Animal Feeding Operations
 - 1. 108 permits: 106 effective permits; 2 administratively continue
 - 2. All are required to submit 1 DMR per year.
 - 3. The Concentrated Animal Feeding Operations general permit covers facilities that do not modify outfalls or equipment during the permit cycle. CAFOs have a single outfall and are required to submit one DMR per year.
- k. MTR000000 Storm Water Discharges Associated with Industrial Activity
 - 1. 208 permits: 208 effective
 - 2. 123 permits are required to submit DMRs
 - 3. 102 permits are using NetDMR; remaining permittees have been contacted
- l. MTR100000 Storm Water Discharges Associated with Construction Activity General Permit
 - 1. 1,055 permits: 1053 effective; 2 pending
 - 2. Storm Water Construction permits do not have DMR requirements
 - 3. Many Storm Water Construction permits are short term authorization and terminate within a years' period. This current number is expected to drop prior to calendar year end.

F. List of Agency MPDES Individual Permits:

MPDES ID	NetDMR Approved	Major Minor Status	Facility Name	Permit Status
MT0000035	Yes	Major	FRENCHTOWN MILL SITE WWTS	Effective
MT0000191	Yes	Major	MONTANA RESOURCES	Effective
MT0000205	Yes	Major	BONNER PROPERTY DEVELOPMENT	Effective
MT0000248	Yes	Major	SIDNEY SUGARS INCORPORATED	Admin Continued
MT0000256	Yes	Major	PHILLIPS 66 - BILLINGS REFINERY	Effective
MT0000264	Yes	Major	CENEX HARVEST STATES COOP.	Effective
MT0000281	Yes	Major	WESTERN SUGAR COOPERATIVE	Admin Continued
MT0000302	Yes	Major	MDU - LEWIS & CLARK PLANT	Effective
MT0000477	Yes	Major	EXXONMOBIL REFINING & SUPPLY	Effective
MT0000892	Yes	Major	DECKER COAL CO (WEST MINE)	Effective
MT0020001	Yes	Major	MILES CITY WWTP	Admin Continued
MT0020028	Yes	Major	CITY OF HAMILTON WWTP	Admin Continued
MT0020044	Yes	Major	LEWISTOWN WWTP	Effective
MT0020184	Yes	Major	CITY OF WHITEFISH WWTF	Effective
MT0020311	Yes	Major	CITY OF LAUREL WWTP	Effective
MT0020397	Yes	Major	BIGFORK WWTP	Admin Continued
MT0020435	Yes	Major	CITY OF LIVINGSTON WWTP	Effective
MT0020478	Yes	Major	RED LODGE WWTF	Effective
MT0020494	Yes	Major	LIBBY WWTP	Effective
MT0021628	Yes	Major	CITY OF GLENDIVE WATER RESOURCE & RECOVERY FACILITY	Effective
MT0021920	Yes	Major	CITY OF GREAT FALLS WWTP	Admin Continued
MT0021938	Yes	Major	CITY OF KALISPELL WWTP	Effective
MT0022012	Yes	Major	BUTTE-SILVER BOW WWTP	Effective
MT0022535	Yes	Major	CITY OF HAVRE WWTP	Admin Continued
MT0022586	Yes	Major	CITY OF BILLINGS WWTP	Effective
MT0022594	Yes	Major	CITY OF MISSOULA WWTP	Effective
MT0022608	Yes	Major	CITY OF BOZEMAN WWTP	Effective
MT0022616	Yes	Major	DEER LODGE WWTP	Effective
MT0022641	Yes	Major	CITY OF HELENA WWTP	Effective
MT0023965	Yes	Major	WESTERN ENERGY CO - ROSEBUD MINE	Effective
MT0024210	Yes	Major	DECKER COAL CO (EAST MINE)	Effective

MPDES ID	NetDMR Approved	Major Minor Status	Facility Name	Permit Status
MT0025020	Yes	Major	PALEO SEARCH INC - SUCTION DREDGE PROJECT	Admin Continued
MT0031755	Yes	Major	BUTTE HIGHLANDS MINE	Effective
MT0000019	Yes	Minor	BN WHITEFISH FACILITY	Admin Continued
MT0000094	Yes	Minor	DAILY'S PREMIUM MEATS - MISSOULA	Effective
MT0000221	Yes	Minor	LINCOLN COUNTY PORT AUTHORITY LCPA	Admin Continued
MT0000230	Yes	Minor	MONTANA SULPHUR & CHEMICAL CO	Effective
MT0000388	Yes	Minor	MONTANA RAIL LINK -LIVINGSTON RAIL YARD	Effective
MT0000400	Yes	Minor	CITY OF HARLOWTON - OIL SKIMMER	Effective
MT0000442	Yes	Minor	GREAT FALLS WTP	Admin Continued
MT0000451	Yes	Minor	ASH GROVE CEMENT COMPANY	Admin Continued
MT0000485	Yes	Minor	TRIDENT PLANT	Admin Continued
MT0000884	No	Minor	BIG SKY COAL COMPANY - BIG SKY MINE	Admin Continued
MT0000931	No	Minor	HARLEM WTP	Effective
MT0020036	Yes	Minor	COLUMBIA FALLS WWTP	Admin Continued
MT0020052	Yes	Minor	CHOTEAU SEWAGE TREATMENT PONDS	Admin Continued
MT0020079	Yes	Minor	CITY OF CONRAD WWTF	Effective
MT0020125	Yes	Minor	CHINOOK WWTP	Effective
MT0020133	Yes	Minor	WHITEHALL WWTF	Admin Continued
MT0020141	Yes	Minor	CITY OF CUT BANK WWTF	Effective
MT0020168	Yes	Minor	LOLO WWTP	Effective
MT0020249	Yes	Minor	JOLIET WWTP	Effective
MT0020303	Yes	Minor	BRIDGER WWTP	Admin Continued
MT0020338	Yes	Minor	TOWN OF CHESTER WWTF	Admin Continued
MT0020354	Yes	Minor	CITY OF HARLOWTON WWTF	Admin Continued
MT0020371	Yes	Minor	EKALAKA WWTF	Effective

MPDES ID	NetDMR Approved	Major Minor Status	Facility Name	Permit Status
MT0020389	Yes	Minor	MALTA SEWAGE TREATMENT LAGOONS	Admin Continued
MT0020401	Yes	Minor	THREE FORKS DOMESTIC WWTF	Effective
MT0020451	Yes	Minor	RYEGATE WWTP	Admin Continued
MT0020460	Yes	Minor	YELLOWSTONE BOYS & GIRLS RANCH	Effective
MT0020516	Yes	Minor	WIBAUX WWTP	Effective
MT0020656	Yes	Minor	HINSDALE WWTF	Effective
MT0020664	Yes	Minor	SUPERIOR WWTF	Effective
MT0020699	Yes	Minor	WHITE SULPHUR SPRINGS WWTF	Effective
MT0020702	Yes	Minor	WINNETT WWTF	Effective
MT0020753	Yes	Minor	BIG TIMBER	Effective
MT0020796	Yes	Minor	TOWN OF CIRCLE WWTP	Admin Continued
MT0021211	Yes	Minor	CITY OF GLASGOW WWTF	Effective
MT0021229	Yes	Minor	WESTMORELAND RESOURCES INC - ABSALOKA MINE	Effective
MT0021270	Yes	Minor	CITY OF HARLEM - WWTP	Effective
MT0021288	Yes	Minor	FORSYTH WWTP	Effective
MT0021385	Yes	Minor	JORDAN WWTF	Admin Continued
MT0021431	Yes	Minor	MT BEHAVIORAL HEALTH INC WWTP	Effective
MT0021440	Yes	Minor	VAUGHN WWTF	Effective
MT0021458	Yes	Minor	CITY OF DILLON WWTF	Admin Continued
MT0021555	Yes	Minor	ALBERTON WWTP	Effective
MT0021571	Yes	Minor	TOWN OF BELT - WWTP	Admin Continued
MT0021601	Yes	Minor	FORT BENTON WWTP	Effective
MT0021636	Yes	Minor	HOBSON SEWAGE TREATMENT PLANT	Effective
MT0021679	Yes	Minor	SUNBURST WWTF	Effective
MT0021709	Yes	Minor	HYSHAM WWTP	Effective
MT0021733	Yes	Minor	WEST GLENDIVE WWTP	Effective
MT0021750	Yes	Minor	ABSAROKEE SEWER DISTRICT WWTP	Admin Continued
MT0021792	Yes	Minor	TOWN OF VALIER WWTF	Effective
MT0021849	Yes	Minor	SIDNEY WASTEWATER TREATMENT FACILITY	Effective

MPDES ID	NetDMR Approved	Major Minor Status	Facility Name	Permit Status
MT0021857	Yes	Minor	MANHATTAN WWTF	Admin Continued
MT0022080	Yes	Minor	HIGHWOOD WWTP	Admin Continued
MT0022161	Yes	Minor	TOWN OF STANFORD DOMESTIC WWTF	Admin Continued
MT0022373	Yes	Minor	COLSTRIP WWTP	Effective
MT0022390	Yes	Minor	LIBBY DAM WWTP	Effective
MT0022454	Yes	Minor	TOWN OF BIG SANDY - WWTF	Effective
MT0022462	Yes	Minor	DENTON WWTP	Admin Continued
MT0022560	Yes	Minor	EAST HELENA WWTF	Admin Continued
MT0022578	Yes	Minor	USBOR HUNGRY HORSE DAM WWTP	Effective
MT0022705	Yes	Minor	GARDINER WWTF	Effective
MT0022713	Yes	Minor	STEVENSVILLE WWTP	Effective
MT0023078	Yes	Minor	CITY OF BOULDER WWTF	Admin Continued
MT0023566	Yes	Minor	ELKHORN REHABILITATION CENTER LLC	Admin Continued
MT0023604	Yes	Minor	WESTMORELAND SAVAGE CORP - SAVAGE MINE	Admin Continued
MT0023639	Yes	Minor	BOULDER HOT SPRINGS PEACE VALLEY HOT SPRINGS WWTP	Effective
MT0024619	Yes	Minor	SPRING CREEK MINE	Admin Continued
MT0024716	Yes	Minor	STILLWATER MINING COMPANY	Effective
MT0024783	No	Minor	TOWN OF SAVAGE WWTP	Effective
MT0025038	Yes	Minor	WILLOW CREEK SEWER DISTRICT	Effective
MT0026808	Yes	Minor	STILLWATER MINING COMPANY	Effective
MT0027430	Yes	Minor	ROCKER WWTP	Effective
MT0027821	Yes	Minor	BEAVERHEAD TALC MINE	Effective
MT0028118	Yes	Minor	LIVINGSTON SWIMMING POOL	Effective
MT0028321	Yes	Minor	EXXONMOBIL BILLINGS REFINING AND SUPPLY	Effective
MT0028584	Yes	Minor	IMERYS TALC AMERICA - YELLOWSTONE MINE	Effective
MT0028665	Yes	Minor	SUN PRAIRIE VILLAGE WWTP	Effective
MT0028720	Yes	Minor	TENMILE WATER TREATMENT PLANT	Admin Continued
MT0028797	Yes	Minor	TWIN BRIDGES WWTF	Effective

MPDES ID	NetDMR Approved	Major Minor Status	Facility Name	Permit Status
MT0028983	Yes	Minor	BULL MOUNTAIN MINE #1	Effective
MT0029840	Yes	Minor	MOTEL PARTNERS I - ECONOLODGE	Effective
MT0029891	Yes	Minor	BARRETTS MINERALS INC	Effective
MT0029980	Yes	Minor	MONTANA AVIATION RESEARCH CO	Effective
MT0030066	Yes	Minor	COLUMBIA FALLS ALUMINUM CO	Effective
MT0030091	Yes	Minor	TOWN OF STOCKETT WWTP	Admin Continued
MT0030147	Yes	Minor	ASARCO - METG - EAST HELENA SMELTER	Admin Continued
MT0030155	Yes	Minor	CITY OF BOZEMAN WTP	Effective
MT0030180	Yes	Minor	YELLOWSTONE ENERGY LIMITED PARTNERSHIP FACILITY	Effective
MT0030244	Yes	Minor	TOWN OF KEVIN WWTF	Admin Continued
MT0030252	Yes	Minor	TVX MINERAL HILL INC -TVX MINERAL HILL MINE	Effective
MT0030261	Yes	Minor	CITY OF LAUREL	Effective
MT0030279	Yes	Minor	MONTANORE MINERALS CORP MONTANORE MINE	Admin Continued
MT0030287	Yes	Minor	RC RESOURCES- ROCK CREEK MINE	Effective
MT0030295	Yes	Minor	CITY OF ROUNDUP WWTP	Effective
MT0030309	Yes	Minor	TOWN OF GRASS RANGE WWTP	Admin Continued
MT0030341	Yes	Minor	CITY OF LIBBY WTP	Effective
MT0030350	Yes	Minor	REC ADVANCED SILICON MATERIALS LLC	Admin Continued
MT0030392	Yes	Minor	M&K OIL COMPANY - WRIGHT CREEK WATER DISPOSAL FACILITY	Effective
MT0030414	Yes	Minor	CITY OF WHITEFISH WTP	Effective
MT0030422	Yes	Minor	CITY OF COLSTRIP WTP	Effective
MT0030465	Yes	Minor	TOWN OF PLAINS WWTP	Admin Continued
MT0030473	Yes	Minor	CITY OF CHINOOK WTP	Effective
MT0030601	Yes	Minor	LAKE MCDONALD WWTP GLACIER NATIONAL PARK	Effective
MT0030651	Yes	Minor	ABBEY MAIN HOUSE	Effective
MT0030732	Yes	Minor	ENNIS WWTP	Effective
MT0031411	Yes	Minor	WOLF MOUNTAIN COAL	Effective
MT0031437	Yes	Minor	SWEET GRASS WWTF	Admin Continued
MT0031453	Yes	Minor	WINIFRED DOMESTIC WWTF	Effective
MT0031488	Yes	Minor	CITY OF SHELBY WWTP	Effective

MPDES ID	NetDMR Approved	Major Minor Status	Facility Name	Permit Status
MT0031500	Yes	Minor	TOWN OF PHILIPSBURG WWTP	Effective
MT0031551	Yes	Minor	US ARMY CORPS OF ENGINEERS FORT PECK PROJECT	Admin Continued
MT0031623	Yes	Minor	IOFINA NATURAL GAS WATER TREATMENT FACILITY	Admin Continued
MT0031631	Yes	Minor	CITY OF BOZEMAN - LYMAN CREEK RESERVOIR	Admin Continued
MT0031658	Yes	Minor	COLLINS POOL HOUSE	Effective
MT0031691	Yes	Minor	DENBURY ONSHORE - BELLE CREEK CENTRAL FACILITY	Effective
MT0031712	Yes	Minor	WOLF CREEK WWTF	Admin Continued
MT0031721	Yes	Minor	DRUMLUMMON GOLD MINE	Effective
MT0031747	No	Minor	H AND R ENERGY - KRAUSE LEASE	Effective
MT0031763	Yes	Minor	RC RESOURCES - ROCK CREEK PROJECT	Effective
MT0031780	Yes	Minor	ROSEBUD POWER PLANT COAL PILE RUNOFF	Effective
MT0031798	Yes	Minor	TOWN OF CULBERTSON DOMESTIC WWTF	Effective
MT0031879	No	Minor	LAUREL TRAVEL CENTER	Effective

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

In this section, detail the current NPDES data systems and/or e-reporting tools that your agency currently employs, or your planned e-reporting systems/tools. States that elect to use EPA's electronic reporting tools can cite that in this section.

Montana is developing a new data system, named FACTS, which will provide the ability for electronic permit application (NOI) submissions through an on-line permit wizard and permittee dashboard, permit development and coding with an internal browser-based workflow management system, compliance inspection information, and program reports. Reports and permit documents will be managed with a document management system internal to the FACTS system. All data required by 40 CFR Part 127 Appendix A will be submitted to EPA ICIS-NPDES database using the Exchange Network NPDES data flow, with the exception of permit holders that have requested and received an electronic reporting waiver (see section 7 below). For reporting elements that DEQ receives in hard-copy, staff will enter those reporting elements directly into the EPA ICIS-NPDES database.

Montana current enters data directly into ICIS-NPDES and while the majority of the core permit and other Appendix A data elements will be submitted to ICIS via the Exchange Network, we will retain the capacity and ability to enter data directly as needed. Additionally, we will run data reports from ICIS outside of FACTS for certain business needs. For example, we expect to pull annual flow and

violation data for annual fee calculations, process this data into a simple .txt file of average annual flow and violations Y/N and load that into FACTS to calculate annual fee invoices.

Montana is using NetDMR as their electronic DMR submission tool and completed implementation of NetDMR for MPDES individual permittees and general permittees by the June 30, 2016 monitoring period. As of **November 1, 2016**, 437 of 509 MPDES permittees with DMR requirements, exclusive of CAFO general authorizations, are active in NetDMR. New MPDES permittees are required to use NetDMR for reporting.

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

In this section, if you have a current system, describe key tasks for updating the agency NPDES data systems to manage and share the data in each of the Phase 2 Data Groups with EPA's ICIS-NPDES (e.g., adding new data elements to state NPDES data systems, updating the state's electronic data transmission capabilities, including incorporating new data schemas and Environmental Information Exchange Network node plug-ins). If you do not have a current system, describe your development and/or purchasing process and timelines. If multiple state agencies administer these programs, this can be a combined plan or each agency may submit a plan. Please indicate if you plan to use the EPA NeT system for any of these items. Timelines will then be as NeT becomes available. For either scenario, describe the roles and responsibilities for agency staff, contractors (if needed), and EPA (if needed). Include estimated completion timelines for each of the key tasks for each data group in this section. Clearly state if data system updates will cover more than one data group (data group subsections may be combined as needed). Indicate if your plan is to direct enter data into ICIS rather than electronically flow data. As an example, data groups have been listed below. Your agency may have different names for these groups. These are for example purposes only. The following table summarizes the major milestones for each NPDES Data Group.

Montana is developing a new information management system, named FACTS, which will provide functionality for permittees to prepare and submit permit applications and renewals electronically through an on-line permit wizard and permittee dashboard. The permittee dashboard will provide a user the ability to manage organizations (permitted entities) that they are authorized for, communicate with DEQ staff, submit documents and reports, and pay associated fees. Identity proofing and validation will be managed using EPA's Shared CROMERR Services.

DEQ personnel (permit writers, data managers, compliance inspectors, and program managers) will interact with the FACTS system using web-based dashboards facilitating application review, permit development and issuance, communication with permittee, permit coding, and compliance inspection reporting. All data elements require by 40 CFR Part 127 Appendix A will be submitted to EPA ICIS-NPDES database using the Exchange Network NPDES data flow, with the exception of permit holders that have requested and received an electronic reporting waiver (see section 7 below). For reporting elements that DEQ receives in hard-copy, staff will enter those reporting elements directly into the EPA ICIS-NPDES database.

A. *Core NPDES Data (permitting, compliance, enforcement):*

Permitting, Compliance (Reports) & Enforcement Data: These data are included in the program's FACTS information management system during Phase 1 development. CROMERR compliance approval is expected to be received in the first quarter of 2017.

Task Completion Timeline:
Phase 1 - December 2018

Agency/Contractor/EPA Roles and Responsibilities:

MT DEQ: Provide project charter, scope, system requirements, internal project management, contract and contractor management, and user acceptance testing.

Contractor: Perform system development per contracted requirements, contractor project management, system maintenance and warranty post production deployment.

EPA: CROMERR application approval.

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

Task Completion Timeline: December 2018

Agency/Contractor/EPA Roles and Responsibilities: See item A above.

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

Task Completion Timeline: December 2018

Agency/Contractor/EPA Roles and Responsibilities: See item A above.

- D. Municipal Separate Storm Sewer System (MS4) Program Reports - See 40 CFR 122.34(g)(3) and 122.42(c)

Task Completion Timeline: December 2018

Agency/Contractor/EPA Roles and Responsibilities: See item A above.

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

Montana DEQ does not have program authorization for Pretreatment.

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

Montana DEQ does not have program authorization for Pretreatment.

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

Task Completion Timeline: December 2018

Agency/Contractor/EPA Roles and Responsibilities: See item A above.

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

Task Completion Timeline: December 2020

Agency/Contractor/EPA Roles and Responsibilities: See item A above.

- I. Sewage Sludge/Biosolids Annual Program Reports - Complete this subsection only if the agency is the authorized NPDES program for biosolids; see 40 CFR 503

Montana DEQ does not have program authorization for Sewage Sludge/Biosolids.

5. CROMERR Compliance Status for Agency Electronic Reporting Systems

In this section, describe Cross-Media Electronic Reporting Rule (CROMERR) compliance status for the agency's e-reporting systems (e.g., anticipated application dates, approval dates or anticipated approval dates) for each Phase 2 NPDES data group. Clearly state if CROMERR approval dates will cover more than one data group (data group subsections may be combined as needed or there can be one date that applies to all categories). States that elect to use EPA's electronic reporting tools can cite that in this section as these CROMERR approvals can be expedited.

A. General Permit Reports

CROMERR Approval Date: Expected to be in the first quarter of 2017; will be implementing Shared CROMERR Services out of the box with minor modification.

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

CROMERR Approval Date: Expected to be in the first quarter of 2017; will be implementing Shared CROMERR Services out of the box with minor modification.

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

CROMERR Approval Date: Expected to be in the first quarter of 2017; will be implementing Shared CROMERR Services out of the box with minor modification.

D. Pretreatment Program Reports

Montana DEQ does not have program authorization.

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

Montana DEQ does not have program authorization.

F. Sewer Overflow/Bypass Event Reports

CROMERR Approval Date: Expected to be in the first quarter of 2017; will be implementing Shared CROMERR Services out of the box with minor modification.

G. CWA section 316(b) Annual Reports

CROMERR Approval Date: Expected to be in the first quarter of 2017; will be implementing Shared CROMERR Services out of the box with minor modification.

H. Sewage Sludge/Biosolids Annual Program Reports

Montana DEQ does not have program authorization.

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

Provide scheduled estimated end dates for updating state statutes, regulations, and NPDES permits. Note if these have already been completed or are not necessary. Discuss the status of required regulatory issues.

The State of Montana has passed rules that establish the authority and structure to allow electronic reporting. In June 2011, the Administrative Rules of Montana were revised to include electronic reporting, specifically in rule 17.4.803.

17.4.803 USE OF ELECTRONIC RECORD RECEIVING SYSTEM

(1) If the board or department has adopted a rule, or, if the department has issued a permit or license that includes a provision or condition allowing submission of an electronic record pursuant to this subchapter in lieu of submission of a paper document, a person who submits an electronic record pursuant to the rule, permit, or license shall submit the record to the department's electronic record receiving system that is appropriate for the particular record, or an authorized EPA electronic record receiving system, such as EPA's NetDMR system, that meets the requirements of 40 CFR Part 3, EPA's Cross-Media Electronic Reporting Regulation, and that is appropriate for the particular record.

(2) All electronic records submitted pursuant to this subchapter must bear a valid electronic signature of a signatory if the signatory would be required to sign the paper document for which the electronic record is substituted.

(3) A person submitting an electronic record pursuant to this subchapter is legally bound, obligated, or responsible by the submittal and content of the record to the same extent as by the submittal and content of the paper document for which the electronic record is substituted.

All Montana water discharge permits have had electronic reporting added to the permit requirements beginning in January 2016. Individual and Master General Permits that come due for renewal after this date will have electronic reporting requirements included as well.

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

In this section, describe the agency's temporary and/or permanent waiver approval processes and criteria for granting waivers. Please include any current practices as well as future processes. If a waiver is granted, it is the responsibility of the regulatory agency to insure all Appendix A data received in paper format is shared with EPA in electronic format.

Temporary Waivers: Montana will use a waiver request process that includes a written waiver request form. Waiver request forms received will be reviewed by program personnel to determine acceptability of the request. Valid reasons for granting the waiver include religious, limited broadband internet access, or other technological reasons. Following the review, a letter will be provided to the person or entity submitting the waiver detailing the facility information, the program's decision and justification, and the waiver request re-submittal date. The program's response letter will also reaffirm that paper reporting is still required per permit schedule, with all required reporting elements, as being conducted presently. Temporary waivers will be granted for 1 year, the remaining permit coverage, or up to 5 years.

Episodic Waivers: Montana will issue short-term episodic waivers of up to 60 days for effected permit holders in instances of unforeseen events such as natural disasters, prolonged electrical outage, or circumstances unique to the permittee (e.g., serious illness or death of owner/operator).

8. Outreach and Training

In this section, summarize the outreach and training necessary to alert and educate NPDES regulated entities on how to utilize the agency's planned electronic reporting systems. Please include past, present and future information.

Montana's regulated community has been aware of the change to electronic reporting for at least three years. Much of that initial outreach and communication has been focused on DMR reporting

using NetDMR. However, the program has included discussions of a new “permit application and management system” that the state intended to develop. The response from many individuals was positive – at least from the consultants that often are contracted by individual permit holders (businesses) to develop permit applications.

Permits: We will be developing a number of outreach and education approaches to reach our permittees and associated consulting firms to assist them with learning our new FACTS on-line permitting system.

- Tri-fold informational brochure direct mailer to all permit holders and known environmental consultants
- System information and/or brochure to be included with permit renewal reminder letters that are sent to permittees 1 year prior to renewal due date. This letter will include information on the process to create an account, using the system, and how to access help and training materials.
- Develop talking points paper and power point presentations to be used by staff and managers attending stakeholder group meetings, e.g., Master General Permits, industry associations, SWPPP Administrator trainings, Water Schools, etc.
- Provide system information and development status during pre-permit meetings with permittees.
- Use of environmental consultants that are locally-based (i.e., Helena) for system testing of the on-line permit application wizards, fee payment, and Shared CROMERR Services components of the system. This is anticipated to occur during Q2 or Q3 of 2017.

In addition to the information products developed for direct mailing and meetings, similar products will be developed and optimized for DEQ’s Water Pollution Control web page:

<http://deq.mt.gov/Water/WPB/mpdes>.

When our external system is ready for production deployment we will have training resources (e.g., videos and/or power point slides) developed which can be deployed on our web page and/or on YouTube. In addition, we will offer group training sessions using GoToMeeting to provide an interactive medium to show the system, how it is used, and address questions as they come up.

Priority rankings (sequencing) of the groups that need attention so as to focus program resources on training and assistance are as follows:

- 1st - Storm Water Construction MG Permit authorization holders (this is our largest and most active group;
- 2nd - Individual permits and MG Permits coming due for renewal in late 2018 through 2019;
- 3rd - Individual permits and MG Permits coming due for renewal in 2020

NetDMR: All facility that submit DMRs were contacted with post card mailers in November 2013, which introduced them to the NetDMR system. The program then provided an in-person training event at DEQ’s Helena office in May 2014. This event provided facilities the opportunity to create NetDMR accounts and learn how to navigate NetDMR with the assistance of DEQ staff. A brochure describing NetDMR and electronic reporting was developed and distributed with permit renewals, by inspectors during on-site visits, and were included with discharge violation letters. Our permitting data staff also attend all water schools in the state from 2014 – 2016 and provided instructional classes for facility participants on NetDMR and assisted with establishing user accounts. Detailed information, system requirements, and step-by-step account set up material was developed and posted to the program’s web page (<http://deq.mt.gov/Water/wqinfo/ctss/netdmr>). During 2016 the

program offered eight GoToMeeting sessions for facilities to gain training on NetDMR reporting. Of the eight scheduled sessions, five had interested respondents and were conducted. Assistance has also been provided on a 1-on-1 basis for any facility that has called the program. Finally, all facilities that do not have a NetDMR account at present were sent a letter to remind them to use NetDMR for submitting their DMRs, or to submit a waiver request form.

9. Alternative Options

In this section, summarize alternative options for converting to electronic reporting (e.g., utilization of EPA services and systems like NetDMR, NeT, or buying a Commercial Off-The-Shelf (COTS) system.) (This is a "Plan B" in case there are issues with implementing your "Plan A".)

Implementation of NetDMR is nearly complete and Montana will continue forward with this system for discharge monitoring reports. If the FACTS development project stalls or fails, then the program will continue as it is currently operating with direct entry of data into ICIS-NPDES upon receipt of required reporting data for facilities, permits, compliance, and enforcement.

10. Obstacles to Rule Implementation

In this section, describe any potential obstacles to e-reporting your agency anticipates, and discuss plans for overcoming these obstacles

The two foreseeable obstacles to implementation are 1) program and project staffing and 2) FACTS project participation by program staff.

Staffing: Staff turn-over has already occurred during the FACTS project. These positions have been back-filled with new staff and they have been brought on to the project team for unit testing. If staff turn-over occurs in the future the approach will be to back-fill as quickly as possible and bring them on to the team. The risk to implementation due to staff turn-over is low.

Project participation: program staff participation in the project has been good and is not likely to be a significant risk due to buy-in from senior management to make the project successful. The risk to implementation due to staff participation is low.

11. Implementation Plan Reassessment

In this section, identify the circumstances when the agency will contact EPA regarding a possible reassessment of this Implementation Plan. This cooperative discussion between EPA and the agency is intended to help evaluate all options for ensuring that the agency will be able to continue working towards complying with the E-Reporting Rule.

Substantive changes to the FACTS system development project where the project schedule changes such that meeting the December 21, 2020 implementation is deemed at risk.