

NPDES Electronic Reporting Rule Phase 2 Implementation Plan

New Jersey Department of Environmental Protection (NJDEP) 8/4/2017

1. Overview/Executive Summary

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. In accordance with the final rule [40 CFR 127.26(h)], a state, tribe, or territory that is designated by EPA as the initial recipient for a NPDES data group must submit an implementation plan to EPA for review by December 21, 2016. 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 II data. This plan does not need to include electronic reporting of Discharge Monitoring Reports (DMRs).

Consistent with our April 19, 2016 letter to EPA, New Jersey has designated EPA as the initial recipient for the Concentrated Animal Feeding Operation Annual Program Reports (i.e. data group 5). In addition, since New Jersey is not delegated by EPA to implement the federal NPDES biosolids program, EPA is the designated initial recipient for Sewage Sludge/Biosolids Annual Program Reports (i.e. data group 4). New Jersey plans to be the initial recipient for all other Phase II Appendix A data groups. New Jersey will also investigate alternatives to being an initial recipient of Phase II Appendix A data group information, if obstacles listed in Section 10 of this document cannot be overcome.

To comply with the federal Electronic Reporting Rule requirements associated with being an initial recipient of Phase II Appendix A data group information, New Jersey plans on modifying existing services, or developing new services, to collect the necessary information electronically. In addition, New Jersey intends on modernizing our existing NPDES permitting database (i.e. NJEMS) to store and display the submitted information. Lastly, to share and maintain Phase II data in a manner that is timely, accurate, complete and consistent, New Jersey plans on building a Node data flow that will transmit the appropriate data from NJEMS to ICIS-NPDES using our Exchange Network Node.

New Jersey will strive to implement the necessary upgrades to our systems by the December 21, 2020 deadline. However, we do not think the target date is achievable. We will not be able to fully develop a Phase 2 schedule until we finish working with EPA to complete Phase 1 in the Fall of 2017. Our concerns regarding the target date are further detailed in section 10 of this document. Despite these challenges, New Jersey is committed to continue working with EPA to complete both phases 1 and 2.

Below are the main personnel involved with development and implementation of the electronic reporting projects necessary for Phase II data collection, storage, and maintenance:

- Mike Matsko, Division of Information Technology
- Theresa Pagodin, Division of Information Technology
- Terry Beym, Division of Water Quality
- Jason Lonardo, Division of Water Quality
- John Smith, Compliance and Enforcement
- Melissa Hornsby, Compliance and Enforcement
- Alissa Gregory, Water Compliance and Enforcement

2. Agency NPDES Universe

As of November 14, 2016, New Jersey's NPDES universe of active and administratively continued individual permits, master general permits, and general permit authorizations consists of:

- 135 Major Individual Permits,
- 436 Minor Individual Permits,
- 24 Master General Permits, and
- 8013 General Permit Authorizations

In addition, while ICIS-NPDES currently contains information on some of the above permits, New Jersey has concluded that the information is not accurate. First, there were observed issues associated with the initial transfer of New Jersey's data between PCS and ICIS-NPDES. Second, New Jersey has not updated a federal NPDES database since 2012.

For a more detailed breakdown of the above information, as well as information regarding the # of permits and GPAs that are not in ICIS-NPDES, please refer to *Table 1* at the end of this document.

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

Below is a summary of the electronic reporting tools that New Jersey currently employs, or is planning to employ, to comply with the Phase II requirements of the Electronic Reporting Rule.

A. Collection of Phase II data

i. For Data Group 2 (General Permit Reports):

New Jersey currently employs an electronic reporting service to accept general permit reports for *only* one NPDES general permit; the Construction Activity Stormwater General Permit. Considering the requirements of the Electronic Reporting Rule, New Jersey plans on developing a new service that will allow for the electronic submission of the NPDES general permit reports cited in the E-Reporting Rule (i.e. NOIs, NOTs, etc.), as well as NJPDES permit applications for both individual and general NJPDES permits. This new service will allow clients to submit application information online through an interactive interface allowing for immediate client feedback and immediate data migration into the State's New Jersey Environmental Management System (NJEMS) upon submittal certification. The service will allow for the vetting of submitted information through an online administrative and/or technical review process/evaluation. In some cases, this process could lead to the creation of a final general permit authorization. Certified submittals would be migrated into NJEMS where the information could be located under a newly created gray bar or an existing gray bar; depending on the action. In developing the service, the Department should leverage everything that has previously been created in the Regulatory Services Portal (RSP) environment to accommodate these services, including auto generated emails to clients and to case managers and attachment upload capability. Types of activities to be addressed through the service include, but are not limited to:

- Individual permit action applications and general permit requests for authorization (i.e. New, Renewal, Modification, Revoke and Reissue, Revocation)
- Stormwater Non-applicability Applications (e.g. Permanent No Exposure, Exemptions within CSO areas, etc.)
- Permit application decisions (e.g. administratively complete, approvals, denials, closures, withdraws, etc.)
- Permit Transfers Requests
- Administrative Update Requests

ii. For Data Group 6 (Municipal Separate Storm Sewer System (MS4) Program Reports):

New Jersey currently employs an electronic reporting service to accept annual MS4 program reports (Note: Since New Jersey does not have any small MS4s, there is no need to accept MS4 program reports at a frequency other than annually). The service has been in production since 2011.

iii. For Data Group 7 (Pretreatment Program Reports) and Data Group 10 (CWA Section 316(b) Annual Reports):

New Jersey does not currently employ electronic reporting services to accept pretreatment program reports or CWA Section 316(b) annual reports. Considering the requirements of the Electronic Reporting Rule, as well as New Jersey's initiative to continually improve our ability to conduct business electronically, the State plans on developing a new service through the Regulatory Services Portal (RSP) that will allow for all NPDES/NJPDES or TWA permit holders to satisfy permit submittal requirements, including those resulting the required data group 7 and 10 reports, through the electronic submission of such documents to the NJDEP. This service will...

- Allow regulated entities to upload reports via an *Attachment Upload* window or via the input of data in web forms that are then migrated into existing or new fields in NJEMS,
- Allow for the uploading of reports or correspondences integral to the implementation of the NJPDES permit or TWA, that are not necessarily tied to a permit submittal requirement,
- Allow for the automatic updating of permit/TWA submittal NJEMS activity tracking tasks with the date of the submittal certification,
- Allow the regulated entities to view all of their submittal requirements and allow them to check off which one they are reporting on,
- Allow for the recognition and enforcement of specific mandatory reporting requirements based on the NJPDES permit or TWA chosen,
- Improve upon the RSP's *Attachment Upload* interface to be more intuitive and user-friendly,
- Send emails to staff and/or management, upon migration of the submission into NJEMS, informing them of the submittal. This will be done through leveraging the existing email functionality of the RSP.

iv. For Data Group 8 (Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs):

All data group 8 Appendix A data elements are currently required to be reported by our permitted SIUs on Discharge Monitoring Report (DMR) forms. New Jersey currently employs an electronic reporting service to accept DMR data submissions. Updates to this service that will improve administration of the DMR submission process and enhance the user interface to be more user-friendly are currently scheduled to go live in early to mid-2017. New Jersey does not anticipate that additional enhancements to this service will be necessary to satisfy the Phase II requirements of the Electronic Reporting Rule as they relate to data group 8.

v. For Data Group 9 (Sewer Overflow Event Reports):

New Jersey currently documents unpermitted sewer overflows in a checklist using the subject item Water-Unpermitted Surface Water Discharge. The checklist requirement that displays is "Were there any discharges of pollutants to the waters of the State not authorized by a valid NJPDES permit?" If marked Out of compliance, the description of non-compliance displays "Discharging pollutants to the waters of the State without a valid NJPDES permit issued by the Department." Once the checklist is locked, a violation is created with the language above. It should be noted that there are 5 subject items for surface water

unpermitted discharges as well as subject items for T1, groundwater and stormwater unpermitted discharges.

It should be noted that New Jersey does not report violations unless they have been included in an enforcement action. A query can be performed at any time that looks for any locked enforcement action where the subject item of the violation exists in a list that we define, namely the subject items related to unpermitted discharges. New Jersey expresses its concern if EPA only wishes to know about unpermitted discharges of sewage, as many of these violations can be for unpermitted discharges of washwater or other industrial discharges.

NJDEP Water Compliance & Enforcement has outlined the following potential options to comply with the Phase II eReporting requirements:

1. Develop an RSP service for the Sewage Overflow Events data that feeds the information into an enhanced Incident module in NJEMS. The Incident module currently does not have fields for all the required data. This data will either be flowed to ICIS or batch loaded by Water Enforcement Staff similar to Phase II of the current New Jersey ICIS-NPDES project.
2. Use the proposed generic RSP service to have facilities submit the Sewage Overflow Events data. However, this would likely require staff time to get the data manually added to ICIS.
3. Continue the current system of using the NJDEP Communication Center to enter the Sewage Overflow Events as incidents. However, this would likely require staff time to get the data manually added to ICIS.
4. Use ICIS as the initial recipient of Sewage Overflow Events and then build a flow to import this data into NJEMS. This option would require NJEMS enhancements similar to option 1 to create placeholders for the required data.

Please note that these are not all the present options and the ultimate solution may be a blend of the options listed above. NJDEP must weigh the monetary costs of enhancements versus the anticipated staff resource costs of a manual approach before reaching any conclusions.

B. Storage/Maintenance of Phase II data in the New Jersey Environmental Management System (NJEMS)

In addition to the development or updating of services/applications to accept the electronic submission of Phase II data, New Jersey will also need to modernize/enhance our NPDES permitting database (i.e. NJEMS) utilizing available federal funding to (1) accommodate additional data group data elements within the table infrastructure and (2) make GUI additions or modifications to accommodate the data entry/viewing of the additional data group data elements.

C. Sharing/Maintenance of Phase II data in ICIS-NPDES

To share and maintain Phase II data in ICIS-NPDES, New Jersey plans on building a Node data flow that will transmit the appropriate data from NJEMS to ICIS-NPDES. Using our Exchange Network Node, a node plug-in will be implemented which will generate XML files on a predefined schedule. The Node will be submitting these files to CDX for loading into ICIS. This data flow will result in submissions that comply with the applicable XML schema and ICIS-NPDES business requirements.

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

<i>NPDES Data Group</i>	<i>Milestones</i>	<i>Responsible</i>	<i>Target Date</i>
A. General Permit Reports	1. <i>Design, Develop, Test, Implement and Train Online submission services in Regulatory Service Portal(RSP)</i>	Agency, Contractors	TBD*
	2. <i>Design, Develop, Test, Implement and Train Required state system changes in NJEMS</i>	Agency, Contractors	TBD*
	3. <i>Design, Develop, Test, and Implement Exchange Network Node plug-in for data transfer to EPA</i>	Agency, Contractors, EPA	TBD*
B. Concentrated Animal Feeding Operation (CAFO) Annual Program Reports	<i>Regulated Facilities will report directly to EPA using NET.</i>	Agency, EPA	TBD*
C. Municipal Separate Storm Sewer System (MS4) Program Reports	1. <i>Design, Develop, Test, Implement and Train Modify online submission service in Regulatory Service Portal(RSP)</i>	Agency, Contractors	TBD*
	2. <i>Design, Develop, Test, Implement and Train Required state system changes in NJEMS</i>	Agency, Contractors	TBD*
	3. <i>Design, Develop, Test, and Implement Exchange Network Node plug-in for data transfer to EPA</i>	Agency, Contractors, EPA	TBD*
D. Pretreatment Program Reports	1. <i>Design, Develop, Test, Implement and Train Online submission services in Regulatory Service Portal(RSP)</i>	Agency, Contractors	TBD*
	2. <i>Design, Develop, Test, Implement and Train Required state system changes in NJEMS</i>	Agency, Contractors	TBD*
	3. <i>Design, Develop, Test, and Implement Exchange Network Node plug-in for data transfer to EPA</i>	Agency, Contractors, EPA	TBD*
E. Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs	1. <i>Design, Develop, Test, Implement and Train Online submission services in Regulatory Service Portal(RSP)</i>	Agency, Contractors	TBD*
	2. <i>Design, Develop, Test, Implement and Train Required state system changes in NJEMS</i>	Agency, Contractors	TBD*
	3. <i>Design, Develop, Test, and Implement Exchange Network Node plug-in for data transfer to EPA</i>	Agency, Contractors, EPA	TBD*
F. CWA section 316(b) Annual Reports	1. <i>Design, Develop, Test, Implement and Train Online submission services in Regulatory Service Portal(RSP)</i>	Agency, Contractors	TBD*
	2. <i>Design, Develop, Test, Implement and Train Required state system changes in NJEMS</i>	Agency, Contractors	TBD*
	3. <i>Design, Develop, Test, and Implement Exchange Network Node plug-in for data transfer to EPA</i>	Agency, Contractors, EPA	TBD*

G. Sewage Sludge/Biosolids Annual Program Reports	<i>Regulated Facilities will report directly to EPA using NET.</i>	<i>Agency, EPA</i>	<i>TBD*</i>
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*= New Jersey will not be able to fully develop a Phase 2 schedule until we finish working with EPA to complete Phase 1 in the Fall of 2017

NJDEP conducted a comprehensive cost analysis for compliance with the eReporting Rule. The details below outline the milestones and cost in greater detail.

1. Creation of a minimum of 40 new on-line services to address the existing 26 General Permits and Annual Report Submittals (some easy some complicated). Based on historic costs for similar on-line services, the following costs can be anticipated:
 2.
 - a. Joint Application Design (JAD) Sessions and System Design Documents - JAD/Design costs for similar services range from \$45,000 to \$75,000. If we take an average cost of \$60,000 per service, the total costs will be \$2,400,000 for the JAD/Design effort for these services. There is a possibility that we may be able to realize synergies between some of the GPs and with the potential to “bundle” some GPs into combined JADs/Designs to offset some of these costs. However, we will not be able to determine this until an initial analysis of effort across all GPs is made. The DEP staffing costs related to this effort are included in the overall staffing costs listed below.
 - b. Development Cost – Recent historic costs for the development effort for a single service range from \$100,000 to \$200,000. If we take a low-end average cost of \$130,000 per service, the total develop costs will be \$5,200,000. There is a possibility that we may be able to realize synergies between some of the GPs and thus have the potential to reduce development costs. However, we won’t know the full extent of the development effort or costs until after the designs for each service has been completed. The DEP staffing costs related to this effort are included in the overall staffing costs listed below.
 - c. Testing – On-site User Acceptance Testing (UAT) for each service is required prior to product acceptance. If we anticipate 5 services per testing event, and a 4 week UAT event each, the cost for each testing event will be \$96,000, for a total contractor cost of \$768,000 for testing of all 40 services. The DEP staffing costs related to this effort are included in the overall staffing costs listed below.
 - d. Rollout/implementation - The contractor costs associated with final script development, release packaging and rollout/post-rollout support typically run about \$40,000. The DEP staffing costs related to this effort are included in the overall staffing costs listed below.
 - e. Training – To ensure that the new services are properly used and administered, WQ will be required to develop both internal and external training plans, training material, and conduct internal and external training. These costs are all staffing costs and are included in the overall staffing costs listed below.
 2. Data Conversion and Data Cleanup – It is anticipated that there will need to be data conversion and data cleanup needed to fully address the changes made to existing services/functionality to address the changes needed, as well to ensure proper operation of the new services. The contractor costs associated with this effort is estimated at \$50,000. The DEP staffing costs related to this effort are included in the overall staffing costs listed below.
 3. Annual Maintenance, Upgrades and Enhancements – Assume an average of 3% of development costs to cover annual maintenance/upgrades/enhancements to the services for the first 2 years. This equates to a cost of \$162,000/year to cover all services.
 4. Exchange Network/NODE Modification – It will be necessary to make modifications/enhancements to our existing USEPA Exchange Network data exchange flow and to our existing Node. The contractor costs

associated with this effort is estimated to be \$234,000. The DEP staffing costs related to this effort are included in the overall staffing costs listed below.

5. NJDEP Staff required for all efforts – Based on similar efforts in the past it is assumed that it will take a total of 4 FTE for each of the 2 years. This is a mix of staff from the Water Quality program, Enforcement and OIRM.

Total Estimated Contractor Costs: \$8,966,000

Total Estimated Staffing Effort: 8 FTE Person-years

5. CROMERR Compliance Status for Agency Electronic Reporting Systems

On January 14, 2010, the New Jersey Department of Environmental Protection (NJDEP) submitted an application titled “Regulatory Services Portal (RSP)” for revisions/modifications of its EPA-authorized programs under title 40 CFR. EPA reviewed NJDEP's request to revise/modify its EPA-authorized programs and, based on this review, EPA determined that the application met the standards for approval of authorized program revisions/modifications set out in 40 CFR part 3, subpart D.

- Part 52—Approval and Promulgation of Implementation Plans
- Part 63—National Emission Standards for Hazardous Air Pollutants for Source Categories
- Part 70—State Operating Permit Programs
- Part 123—EPA Administered Permit Programs: The National Pollutant Discharge Elimination System
- Part 142—National Primary Drinking Water Regulations Implementation
- Part 171—Certification of Pesticide Applicators
- Part 257—Criteria for Classification of Solid Waste Disposal Facilities and Practices
- Part 262—Standards Applicable to Generators of Hazardous Waste
- Part 272—Approved State Hazardous Waste Management Programs
- Part 370—Hazardous Chemical Reporting: Community Right-To-Know
- Part 372—Toxic Chemical Release Reporting: Community Right-To-Know
- Part 403—General Pretreatment Regulations for Existing and New Source of Pollution

NJDEP was notified of EPA's determination to approve its application with respect to the authorized programs listed above.

Approval Date: March 4, 2014

NJDEP intends to collect electronic data for General Permit Reports, Municipal Separate Storm Sewer System (MS4) Program Reports, Pretreatment Program Reports, Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs, Sewer Overflow/Bypass Event Reports and CWA Section 316(b) Annual Reports. Please refer to Section 3 of this document for those reports which are currently submitted electronically and those which are planned to be submitted electronically in the future.

We recently contacted EPA regarding our CROMERR approval and received confirmation that our current approval applies to the new data sets we plan to collect under this implementation plan. If any proposed implementations result in changes to our currently approved CROMERR application, then DEP will take the necessary steps to obtain EPA approval.

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

At this time, New Jersey has concluded that updates to state statutes and regulations are not necessary to require and enforce the provisions of the federal E-Reporting Rule through the States NPDES program. As of November 29, 2016, New Jersey has performed the following actions to incorporate the federal Electronic Reporting Rule requirements into NPDES permits:

- Surface Water Program:
 - All individual permits with an expiration date of August 31, 2016 or later, where the permittee had not yet registered to submit their DMRs electronically, have been modified to incorporate the Phase I and Phase II electronic reporting requirements.
 - All general permits and authorizations with an expiration date of July 31, 2016 or later (excluding the Consolidated DSW Renewal School, Swimming Pool Discharges, Short Term De Minimis, Hydrostatic Test Water, and Wastewater Beneficial Reuse general permits) have been modified to incorporate the Phase I and Phase II electronic reporting requirements.
- Storm Water Program:
 - All individual permits with an expiration date of July 31, 2016 or later have been modified to incorporate both the Phase I and Phase II electronic reporting requirements.
- SIU Program:
 - All permits with an expiration date of June 30, 2019 or later have been modified to incorporate the Phase II electronic reporting requirements.

It is anticipated that all remaining individual and general NPDES permits will be renewed or modified to incorporate the Phase II electronic reporting requirements prior to the deadline of December 21, 2020.

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

New Jersey will not grant temporary or permanent waivers to our NPDES regulated community. As such, documentation of an approval process is not necessary.

8. Outreach and Training

Prior to an electronic reporting system going “live”, New Jersey plans on performing the following actions to educate NPDES regulated entities on how to utilize the system.

- Schedule in-person training sessions at a regular frequency leading up to the date that the system will go “live”.
- Update to the NJDEP’s website (<http://www.nj.gov/dep/dwq>) to provide information on the electronic reporting system including, but not limited to...
 - General information on the electronic reporting system;
 - Reference materials such as system registration information, reference manuals, and FAQs; and
 - Training material such as (1) information on the in-person training sessions, including how to register for the training, (2) powerpoint presentations, and (3) a series of training videos on how to use the electronic reporting system.
- Send written or electronic notification to the regulated community informing them on the electronic reporting system. The notification will include, but is not limited to, the date that the system will go “live”, the link to a webpage where they can obtain more detailed information about the system, and information on the in-person training sessions.

- Follow-up/Assistance provided by Water Compliance and Enforcement through facility inspections and compliance advisories (<http://www.nj.gov/dep/enforcement/advisories-date.html>).

9. Alternate Options

New Jersey is fully committed to the development and implementation of the chosen option (i.e. “Plan A”). New Jersey has evaluated other options for converting to electronic reporting for Phase II data and has concluded that the chosen option is the most appropriate and cost-effective option. Should issues arise that will jeopardize the completion of Plan A, the Department will then, at that time, evaluate other options. That evaluation will be based on many factors including, but not limited to, the resources already expended towards implementation of the Plan A option and the time remaining until the December 21, 2020 deadline. Further, conducting such an evaluation now is not appropriate since many of the electronic reporting services that are necessary for the Phase II data have not yet been developed by EPA or third parties.

10. Obstacles to Rule Implementation

Refer below for the list of potential obstacles to rule implementation regarding Phase II data, as well as the plans for overcoming those obstacles.

- A. Obstacle: EPA and/or its contractor, in a timely manner, does not provide States with the applicable XML schema and ICIS-NPDES business requirements associated with the ICIS-NPDES system enhancements necessary to comply with Phase II implementation.

Solution: Should completion of New Jersey’s Phase II related projects be held up due to delays on the part of EPA and/or its contractor, these delays must be acknowledged and accepted by EPA in terms of the project schedule and the State’s ability to ultimately comply with the Phase II implementation deadline.

- B. Obstacle: New Jersey is unable to secure the funding necessary for completion of all Phase II related projects.

Solution: New Jersey is committed to exhausting all available sources of funding to complete the Phase II related electronic reporting projects. If all avenues are exhausted and the available funding will not result in completion of an electronic reporting project(s), such that compliance with the Phase II deadline is jeopardized, New Jersey will actively prioritize the project tasks to be completed. New Jersey will then contact EPA to discuss potential options in dealing with those tasks or projects that will not be completed prior to the Phase II deadline.

- C. Obstacle: New Jersey is unable to secure the staffing resources necessary for completion of all Phase II related projects due to diminishing resources and competing Departmental priorities.

Solution: New Jersey will make every effort to highly prioritize federal Electronic Report Rule projects, including those associated with Phase II, when assigning staffing resources. If it is believed that insufficient staffing resources may endanger the completion of an electronic reporting project(s), such that compliance with the Phase II deadline is jeopardized, New Jersey will actively prioritize the project tasks to be completed. New Jersey will then contact EPA to discuss potential options in dealing with those tasks or projects that will not be completed prior to the Phase II deadline.

- D. Obstacle: DEP’s public facing infrastructure is housed and supported by the NJ Office of Information Technology (OIT). Our current hardware and application server software is nearing end of life. OIT will begin to evaluate more modern solutions that will be prescribed as NJ standards. This change in platform and possibly architecture could create schedule delays.

Solution: New Jersey is committed to keeping the project on schedule. If scheduling issues arise, New Jersey will then contact EPA to discuss potential options in dealing with those tasks or projects that will not be completed prior to the Phase II deadline.

- E. Obstacle: DEP's enterprise data system for managing NPDES and C&E data is NJEMS. This system is aging and built on technology that is no longer an industry standard. The Division of Information Technology is beginning to evaluate alternatives for replacing NJEMS. The replacement of DEP's data management system can have significant impacts to the project schedule.

Solution: New Jersey is committed to keeping the project on schedule. If scheduling issues arise, New Jersey will then contact EPA to discuss potential options in dealing with those tasks or projects that will not be completed prior to the Phase II deadline.

- F. Obstacle: DEP does not have a contract in place to perform this IT work. An RFP will need to be drafted and finalized. Treasury must review and approve the RFP. Upon approval, DEP would need to submit a GSA request. Bids would need to be reviewed and selection would need to be approved by Treasury. This is a 1-2 year process provided that Treasury authorizes DEP to submit a GSA request. The time required to have an approved contract vehicle to fund vendor services can have impacts to the project schedule.

Solution: New Jersey is committed to keeping the project on schedule. If scheduling issues arise, New Jersey will then contact EPA to discuss potential options in dealing with those tasks or projects that will not be completed prior to the Phase II deadline.

- G. Obstacle: Administration changes at the Federal level will occur in 2017. Administration changes at the NJ State level will occur in 2018. As in past administration changes, spending freezes occur and funding resources become diminished. These administration changes could have impacts to the project schedule.

Solution: New Jersey is committed to keeping the project on schedule. If scheduling issues arise, New Jersey will then contact EPA to discuss potential options in dealing with those tasks or projects that will not be completed prior to the Phase II deadline.

- H. Obstacle: After further evaluation of this plan, it may be determined that it is too costly to implement as prescribed. Especially with the changing platforms and technologies identified above. This will force DEP to reevaluate and revise the implementation plan.

Solution: New Jersey is committed to reaching compliance with the eReporting rule in a cost efficient and intelligent manner. As the implementation plan changes, EPA will be notified along with any schedule impacts.

11. Implementation Plan Reassessment

Should circumstances significantly change regarding any aspect of this implementation plan, New Jersey will contact EPA to discuss potential reassessment of the plan. New Jersey is fully committed to maintaining a cooperative relationship with EPA throughout the development and testing of each electronic reporting service associated with implementation of Phase II of the Electronic Reporting Rule.

Table 1. Number of active and administratively continued individual permits, master general permits, and general permit authorizations (GPAs). All information is current as of November 14, 2016.

Program	Permit Description	Number of Active and Administratively Continued					# of Permits & GPAs with Accurate Info. in ICIS-NPDES
		Major Permits	Minor Permits	Master General Permits	GPAs	Totals	
Surface Water (SW) Program	Individual - Sanitary	94	91	N/A	N/A	185	0
	Individual - Industrial	32	82	N/A	N/A	114	0
	Individual - Combined Sewer Management	0	16	N/A	N/A	16	0
	Individual - Sanitary & Combined Sewer Management	9	0	N/A	N/A	9	0
	Wastewater Beneficial Reuse (GP)	N/A	N/A	1	3	4	0
	Consolidated DSW Renewal School (GP)	N/A	N/A	1	23	24	0
	GW Petroleum Product Clean-up (GP)	N/A	N/A	1	39	40	0
	Swimming Pool Discharges (GP)	N/A	N/A	1	0	1	0
	Short Term De Minimis (GP)	N/A	N/A	1	0	1	0
	Hydrostatic Test Water (GP)	N/A	N/A	1	0	1	0
	General Remediation Clean-up (GP)	N/A	N/A	1	67	68	0
	Potable Water Treatment Plant (GP)	N/A	N/A	1	29	30	0
Non-Contact Cooling Water (GP)	N/A	N/A	1	35	36	0	
Storm Water (ST) Program	Individual - Stormwater	0	175	N/A	N/A	175	0
	Basic Industrial Stormwater (GP)	N/A	N/A	1	1900	1901	0
	Construction Activity Stormwater (GP)	N/A	N/A	1	4883	4884	0
	Concrete Products Manufacturing (GP)	N/A	N/A	1	98	99	0
	Hot Mix Asphalt Producers (GP)	N/A	N/A	1	35	36	0
	Newark Airport Complex (GP)	N/A	N/A	1	26	27	0
	Wood Recyclers (GP)	N/A	N/A	1	10	11	0
	Concentrated Animal Feeding Operations (GP)	N/A	N/A	1	2	3	0
	Tier A Municipal Stormwater (GP)	N/A	N/A	1	456	457	0
	Public Complex Stormwater (GP)	N/A	N/A	1	71	72	0
	Highway Agency Stormwater (GP)	N/A	N/A	1	33	34	0
	Mining and Quarrying Activity (GP)	N/A	N/A	1	55	56	0
	Sand and Gravel (GP)	N/A	N/A	1	10	11	0
	Vehicle Recycling (GP)	N/A	N/A	1	127	128	0
	Scrap Metal Processing / Auto Recycling (GP)	N/A	N/A	1	11	12	0
Scrap Metal Processing (GP)	N/A	N/A	1	100	101	0	
SIU Program	Individual - SIU	0	72	N/A	N/A	72	0
NPDES Program Totals :		135	436	24	8013	8608	0