

EPA's NeT Roadmap for Phase 2 Implementation



Updated: 22 December 2023

NPDES eRule Overview



2014
Before Electronic Reporting
(Approximately 2,400 paper submissions)



2020
4th Year of Electronic Reporting
(2,260 electronic submissions with
14 paper submissions)

- **National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule (eRule)** requires state and other regulatory authorities to share permit, compliance monitoring, violation determination, and enforcement action data electronically with the EPA no later than [December 21, 2025](#).
 - *Signed by EPA on September 24, 2015 and published in the Federal Register on October 22, 2015.*
- Modernizes the Clean Water Act (CWA) reporting for municipalities, industries, and other facilities by replacing most paper-based NPDES reporting requirements with electronic reporting.

Partnering with States: Implementation

Phase 1 – DMR Submissions & Biosolids Reports (21 Dec 2016)

- EPA works with states to ensure that their data sharing rates are above 90% through:
 - Training and assistance for states to implement EPA’s electronic reporting tools (NetDMR and NeT-Biosolids) and data exchange protocols.
 - Submission of Biosolids Annual Program Reports are in Phase 1 where EPA runs the Federal biosolids program (41 states and all territories and tribal lands).

Phase 2 – General Permits and Program Reports (21 Dec 2025)

- EPA works with states to develop electronic reporting tools and data sharing protocols:
 - EPA is collaborating with states to build electronic reporting applications for states that elect to use EPA’s NPDES Electronic Reporting Tool or “NeT.”
 - EPA is collaborating with states to develop new data sharing protocols for Phase 2 data.
 - Collaborating with states on the new NPDES Noncompliance Report (NNCR).



Compliance Monitoring Reports in EPA Region 1 (February 2022)

NeT States



DELAWARE DEPARTMENT OF
NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL



NEBRASKA
DEPT. OF ENVIRONMENT AND ENERGY



TEAM
KENTUCKY
ENERGY AND
ENVIRONMENT CABINET



Illinois Environmental
Protection Agency



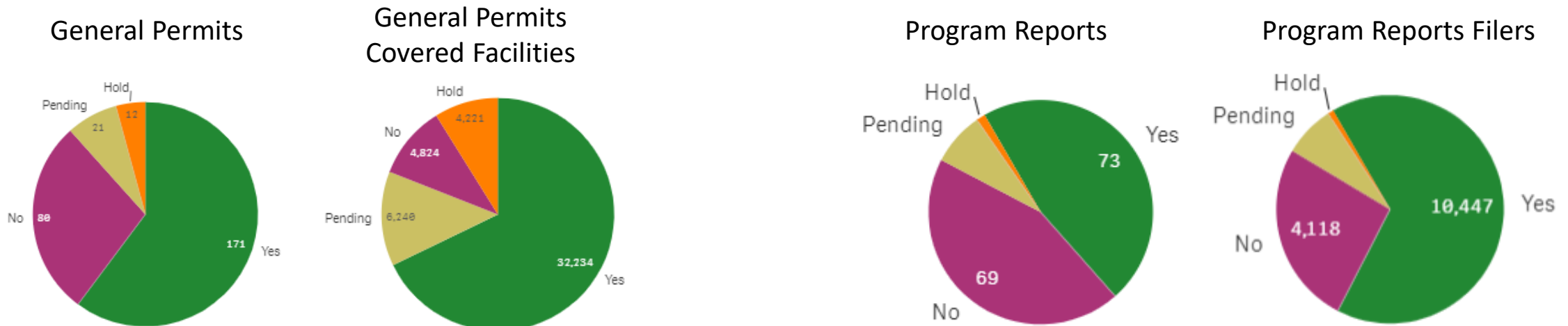
UTAH DEPARTMENT of
ENVIRONMENTAL
QUALITY



Tracking NeT Implementation Progress – Phase 2

- EPA uses the **NPDES eRule Phase 2 Implementation Dashboard** to track progress with NeT implementation (and non-NeT applications as well).
- EPA has deployed a NeT application for nearly **68% of general permit covered facilities** and nearly **66% of program report filers**.
- EPA will review this dashboard with states on a regular basis to ensure that EPA and states are making steady progress towards the December 2025 deadline.

NeT Deployment Status



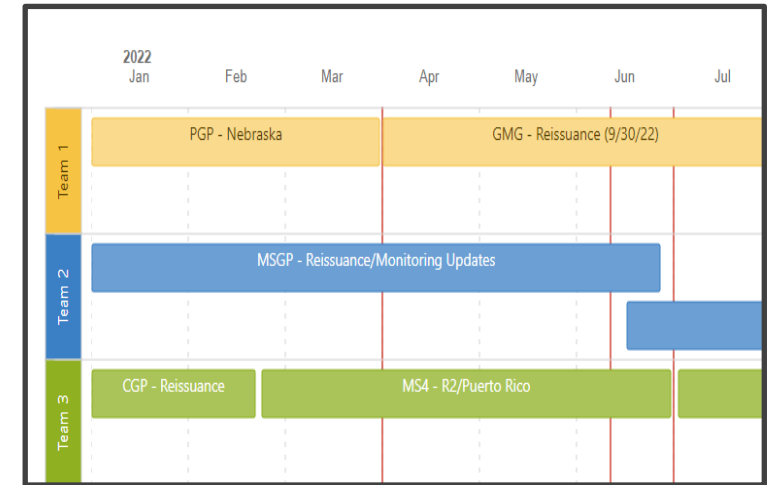


NPDES eRule NeT Roadmap – Getting to the Finish Line

- EPA is currently budgeting and planning out the remaining NeT work for EPA Regional and state general permits and program reports over the next two years.
- EPA asked states to identify when they will likely start working with EPA for each NeT application – “start points.”
- EPA also asked all EPA Regions and states to sign a partnership memo to document their commitment to provide resources to help build and deploy NeT applications.

NeT Roadmap

- The NeT Roadmap uses three NeT development teams that schedule work based on “start points.” These start points have start and end dates that account for the varying level of effort needed for each application.
 - **High** (6 months) – e.g., MS4 general permits and program reports
 - **Medium** (5 months) – e.g., MSGP general permits and permit required annual reports
 - **Low** (4 months) – e.g., PGP
 - **Very Low** (2 months) – e.g., 316(b) Annual Report
- This roadmap implicitly includes the work needed to support general O&M, general permit renewals, and enhancement requests.
- This plan organizes the general permits and program reports into different NeT applications across three teams. These assignments are not definitive and can be re-organized as needed.
- Each NeT development effort will have a lead EPA “Product Owner” who is the single point of contact for coordinating development, deployment, and training.
- The NPDES eRule Phase 2 Implementation Dashboard allows you to see the grouping of NPDES general permits for each NeT application (see “ELMS Board Category” column on general permit table).



Start Point Implementation Schedule – Team #1

NeT Development Start Points for Team #1																																																			
Month -->	21-Oct	21-Nov	21-Dec	22-Jan	22-Feb	22-Mar	22-Apr	22-May	22-Jun	22-Jul	22-Aug	22-Sep	22-Oct	22-Nov	22-Dec	23-Jan	23-Feb	23-Mar	23-Apr	23-May	23-Jun	23-Jul	23-Aug	23-Sep	23-Oct	23-Nov	23-Dec	24-Jan	24-Feb	24-Mar	24-Apr	24-May	24-Jun	24-Jul	24-Aug	24-Sep	24-Oct	24-Nov	24-Dec	25-Jan	25-Feb	25-Mar	25-Apr	25-May	25-Jun	25-Jul	25-Aug	25-Sep	25-Oct	25-Nov	25-Dec
Team 1A (Low - 4mo)	Pesticide Application (NeT-PGP) Start 1A-1: ID & NE					Oil and Gas Extraction (NeT-GMG & NeT-GEG) Start 1A-2: EPA Region 4 & 6					Start 1A-3: NeT-CGP or NeT-PGP (State Issuer)				Start 1A-4: NeT-CGP or NeT-PGP (State Issuer)			Start 1A-5: NeT-CGP or NeT-PGP (State Issuer)			Start 1A-6: NeT-CGP or NeT-PGP (State Issuer)			Start 1A-7: NeT-CGP or NeT-PGP (State Issuer)			Start 1A-8: NeT-CGP or NeT-PGP (State Issuer)			Start 1A-9: NeT-CGP or NeT-PGP (State Issuer)			Start 1A-10: NeT-CGP or NeT-PGP (State Issuer)			Start 1A-11: NeT-CGP or NeT-PGP (State Issuer)															
Team 1B (Medium - 5mo)	Start 1B-1: EPA HQ MSGP (Re-Issuance)						Start 1B-2: NeT-MSGP (State Issuer)						Start 1B-3: NeT-MSGP (State Issuer)						Start 1B-4: NeT-MSGP (State Issuer)						Start 1B-5: NeT-MSGP (State Issuer)						Start 1B-6: NeT-MSGP (State Issuer)						Start 1B-7: NeT-MSGP (State Issuer)														
Team 1C (High - 6mo)	Start 1C-1: EPA HQ CGP (Re-Issuance) & NeT-MS4 Base Application (DE & RI)				Start 1C-2: EPA HQ CGP (Re-Issuance) & NeT-MS4 Onboarding: EPA Region 2 (PR) & two states (DE & RI)				Start 1C-3: NeT-MS4 EPA Region 1 (MA/NH) & Region 6 (NM)				Start 1C-4: NeT-MS4 (State Issuer)				Start 1C-5: NeT-MS4 (State Issuer)				Start 1C-6: NeT-MS4 (State Issuer)				Start 1C-7: NeT-MS4 (State Issuer)				Start 1C-8: NeT-MS4 (State Issuer)				Start 1C-9: NeT-MS4 (State Issuer)																		

The following are the ongoing and remaining efforts for Team #1:

- NeT-CGP (CT, ME, MS, SD, VI)
- NeT-PGP (CT, ID, IL, NE, UT, VI)
- NeT-MSGP (CT, IL, ME, MS, VI)
- NeT-MS4 (EPA Region 1 (MA/NH), EPA Region 2 (PR), EPA Region 3 (DC), EPA Region 5 (Tribal Lands), EPA Region 6 (NM) & CT, DE, IL, LA, ME, MS, NE, RI, SD, UT)

Start Point Implementation Schedule – Team #2

NeT Development Start Points for Team #2																																																			
Month -->	21-Oct	21-Nov	21-Dec	22-Jan	22-Feb	22-Mar	22-Apr	22-May	22-Jun	22-Jul	22-Aug	22-Sep	22-Oct	22-Nov	22-Dec	23-Jan	23-Feb	23-Mar	23-Apr	23-May	23-Jun	23-Jul	23-Aug	23-Sep	23-Oct	23-Nov	23-Dec	24-Jan	24-Feb	24-Mar	24-Apr	24-May	24-Jun	24-Jul	24-Aug	24-Sep	24-Oct	24-Nov	24-Dec	25-Jan	25-Feb	25-Mar	25-Apr	25-May	25-Jun	25-Jul	25-Aug	25-Sep	25-Oct	25-Nov	25-Dec
Team 2A (Low-4mo)	Sewer Overflow/Bypass Event Report (Base Application) Start 2A-1: Region 1 (NH)			Sewer Overflow/Bypass Event Report (Onboarding) Start 2A-2: All EPA Regions and 11 states											Domestic Wastewater Treatment Facilities (Base Application) Start 2A-3: Region 8 (Tribal Lands)					Start 2A-4: NeT-DWTF (IL)		Start 2A-5: NeT-DWTF EPA Region 1 (MA,NH)		Start 2A-6: NeT-DWTF (SD)																											
Team 2B (Medium-5mo)	Groundwater Remediation, Dewatering, Hydrostatic Testing (Base Application) Start 2B-1: Region 1 (MA/NH)				Start 2B-2: NeT-GRDHT (EPA Region 6 - Tribal Lands)			Start 2B-3: NeT-GRDHT (State Issuer)		Start 2B-4: NeT-GRDHT (State Issuer)		Start 2B-5: NeT-GRDHT (State Issuer)		Start 2B-6: NeT-GRDHT (State Issuer)		Start 2B-7: NeT-GRDHT (State Issuer)		Start 2B-8: NeT-GRDHT (State Issuer)		Start 2B-9: NeT-GRDHT (State Issuer)		Start 2B-10: NeT-GRDHT (State Issuer)																													
Team 2C (High-6mo)	SIU Semi-Annual Monitoring Report & Pretreatment Program Report (Base Application) Start 2C-1: EPA Region TBD								SIU Semi-Annual Monitoring Report & Pretreatment Program Report (Onboarding) Start 2C-2: All EPA Regions and 9 states								Drinking Water Treatment (Base Application) Start 2C-3: Region 1 (MA,NH)		Start 2C-4: NeT-DWT: EPA Region 8 (tribal lands)		Start 2C-5: NeT-DWT (UT)		Start 2C-6: NeT-DWT (SD)		Start 2C-7: NeT-DWT (IL)																										

The following are the ongoing and remaining efforts for Team #2:

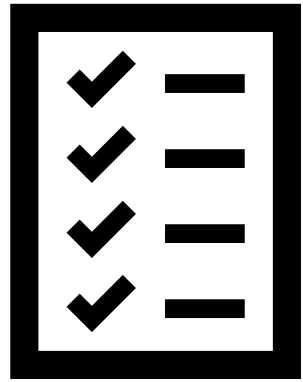
- NeT-SewerOverflow: Onboarding all remaining EPA Regions and 11 states
- NeT-RDHT: EPA Region 1 (MA/NH), EPA Region 6 (tribal lands), & eight states (CT, IL, MS, NE, RI, SD, and UT)
- NeT-Pretreatment Reports: All EPA Regions and 9 states
- NeT-DWTF: EPA Region 1 (MA/NH), EPA Region 8 (tribal lands), & two states (IL and SD)
- NeT-DWT: EPA Region 1 (MA/NH), EPA Region 8 (tribal lands), & three states (IL, SD, UT)

Next Steps

- EPA will continue to work with EPA Regions and states to build NeT applications.
- The EPA Product Owners will use these “start points” to help identify the order of NPDES general permits and program reports for NeT onboarding.
- States that wish to change their start points should contact the EPA Product Owner or NPDESeReporting@epa.gov.

Appendix

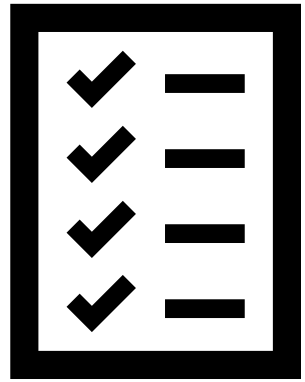
NeT Onboarding Tasks



The following tasks apply to every participating State and EPA Region:

1. EPA Product Owner schedules a kickoff meeting with issuer (State or EPA Region).
2. ETDD/DD and state sign Memorandum of Understanding (MOU), EPA Region signs letter to ETDD/DD that documents roles and responsibilities.
3. State submits the 2-page NeT CROMERR Cover Sheet to OMS/CROMERR Team.
4. EPA Product Owner and issuer collaborate to identify and document permit and program report requirements. Meeting frequency generally depends on the complexity of the requirements.
5. EPA Product Owner conducts sprint reviews and weekly meetings with the issuer throughout the development lifecycle.
6. EPA Product Owner reviews permit and program report requirements with the CDX Engineering Board (EB) for approval prior to CDX-TEST deployment.
7. As needed, OMS publishes a Federal Register notice announcing their approval for the state to use NeT for one or more of the following NPDES programs: Part 123 (core NPDES), Part 403 (Pretreatment), and Part 501 (Biosolids).
8. EPA Product Owner coordinates with issuer to deploy the NeT application to CDX-PROD. This includes developing and implementing a training plan to ensure smooth adoption.

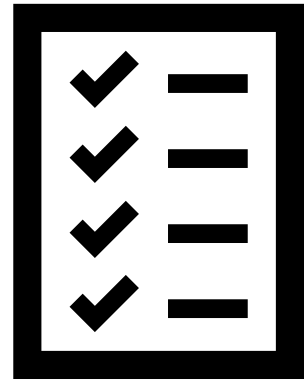
NeT Onboarding Tasks (cont.)



The information below should be provided to EPA as soon as it is available; however, it is preferred that this information be provided no later than four weeks before the project kickoff is scheduled to begin.

- Copy of the current and pending permit
- Copies of all forms to be supported by NeT. This includes Notice of Intent (NOI), No Exposure, No Discharge, Notice of Termination, and Annual Report.
- Identification of any data sharing requirements with EPA's national NPDES data system (ICIS-NPDES) such as facility and permit data as well as limit set creation for Discharge Monitoring Reports.
- Identification of business rules (e.g., review length period, approval process, payment processing)
- Identification of any known potential blockers that might delay development.

NeT Onboarding Process



Step 1 - Project Kick-off: This meeting to formally notify all participants that the project has begun and ensure everyone has a common understanding of the project and their roles.

Step 2 - Requirements: These weekly meetings will identify, discuss, understand, and agree the functionality and features needed to enable NeT to support the permitting process.

Step 3 - Development: EPA's developers will take the requirements identified in Step 2 to build out the functionality and features in the NeT platform.

Step 4 - Testing: The permitting authority will be tasked with verifying and validating that the NeT application implements the requirements identified in Step 2 using CDX-TEST.

Step 5 - Deployment: EPA releases updated NeT application into the production environment (CDX-PROD) and provide documentation and training resources for permitting authorities and the regulated community.



Status of MOUs and CROMERR Checklists (Dec. 2023)

State	EPA Region	Use of NeT for General Permit	Use of NeT for Program Report	MOU Status	NeT CROMERR Cover Sheet Status	Notes
AZ	9	No	Yes	Signed MOU covers NPDES general permits and program reports.	Approval PENDING for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 Biosolids program - Part 501 	Coversheet submitted to EPA CROMERR Team on 11/10/2023
CT	1	Yes	Yes	Signed MOU covers NPDES general permits and program reports.	Approval PENDING for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 	Coversheet submitted to EPA CROMERR Team on 11/2/2023 Not authorized for Federal biosolids program (Part 501)
DE	3	Yes	Yes	Signed MOU only covers use of NeT-MS4.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 	Not authorized for Pretreatment program (Part 403) or Federal biosolids program (Part 501)
ID	10	Yes	No	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Biosolids program - Part 501 Approval PENDING for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 	Coversheet submitted to EPA CROMERR Team on 11/28/2023
IL	5	Yes	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 	Not authorized for Pretreatment program (Part 403) or Federal biosolids program (Part 501)
IN	5	No	Yes	Signed MOU covers NPDES general permits and program reports.	Approval PENDING for: <ul style="list-style-type: none"> Core NPDES program - Part 123 	Coversheet submitted to EPA CROMERR Team on 12/19/2023 Not authorized for Pretreatment program (Part 403) or Federal biosolids program (Part 501)
KY	4	No	Yes	Signed MOU covers NPDES general permits and program reports.	Approval PENDING for: <ul style="list-style-type: none"> Core NPDES program - Part 123 	Coversheet submitted to EPA CROMERR Team on 12/14/2023
LA	6	No	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 	Not authorized for Federal biosolids program (Part 501)
ME	1	Yes	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 	Not authorized for Federal biosolids program (Part 501)

Status of MOUs and CROMERR Checklists (Dec. 2023) (continued)

State	EPA Region	Use of NeT for General Permit	Use of NeT for Program Report	MOU Status	NeT CROMERR Cover Sheet Status	Notes
MS	4	Yes	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 	Not authorized for Federal biosolids program (Part 501)
NE	7	Yes	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 	Not authorized for Federal biosolids program (Part 501)
NJ	2	No	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 	Will only use NeT for CAFO program report
RI	1	Yes	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 	Not authorized for Federal biosolids program (Part 501)
SD	8	Yes	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 Biosolids program - Part 501 	
TX	6	No	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 Biosolids program - Part 501 	
UT	8	Yes	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 Pretreatment program - Part 403 Biosolids program - Part 501 	
VI	2	Yes	Yes	Signed MOU covers NPDES general permits and program reports.	Approved for: <ul style="list-style-type: none"> Core NPDES program - Part 123 	Not authorized for Pretreatment program (Part 403) or Federal biosolids program (Part 501)