

NPDES Electronic Reporting Rule to be Finalized Soon!

The proposed National Pollution Discharge Elimination System (NPDES) Electronic Reporting Rule is anticipated to be finalized by EPA at the end of December 2015 and KDHE will most likely soon follow. The public comment phase ended January 30, 2015. Kansas Rural Water Association staff participated in a webinar on January 15 and provided comments.

KRWA will provide updates as they become available, as the Association wants all systems to be as informed about this proposed rule as soon as possible.

The basic goal of the rule is that all discharge monitoring reports (DMRs) will be submitted via electronic reporting from paper to electronic reporting as a cost reduction

measure, save time and improve accuracy of the DMRs. The proposed E-reporting rule implementation will take place in two phases: Phase 1 will be for DMRs and bio-solids annual reporting one year after the effective date of the final rule possibly the end of 2016. The bio-solids 503 reports have a Phase 1 recommended time and Phase 2 proposed time frame for reporting. KRWA commented that Phase 2 would be more appropriate to allow time to develop the electronic format for reporting. Phase 2 will take effect two years after the effective date of the final rule, possibly by the end of 2017. These reports will be for combined sewer overflows (CSOs), Sanitary Sewer Overflows (SSOs) and bypasses.

Basic Review



Goals Of The Proposed Rule

This rule will help EPA and states clean up the nation's waters, by:

- ✓ Bring the NPDES Program into the 21st Century by shifting from paper to electronic reporting. Proposed rule establishes no new reporting requirements
- ✓ Save money and time for the regulated community and for states (reduce data entry time, improve accuracy)
- ✓ Improves transparency and frees up resources to focus on the most important problems
- ✓ Uses technology to obtain more accurate, timely, and complete information about the NPDES program

1/15/15 U.S. Environmental Protection Agency

This slide from the 1/15/2015 Webinar by US EPA provides a good summary of the reasons EPA is finalizing the NPDES Electronic Reporting Rule.

Wastewater utilities have the question if this change will affect their utility. The simple answer is “yes it will”, especially those with discharge permits, as they will be impacted in Phase 1. Those with non-discharging permits will be affected in Phase 2 with Sanitary Sewer Overflow and bypass reporting. The E-reporting will not have any increased information than already required, but it will be submitted electronically rather than by paper reports.

There were also comments on waivers for the E- Reporting with possible permanent waiver for NPDES- regulated entities located in religious communities. KRWA commented in support of waivers for small systems that have small populations with few connections such as less than 250 population or 50 connections. Those systems would have to provide a written request for the waiver of completing online entry. KRWA made that recommendation because typically, those small systems have part-time operators and city clerks and they do not generally have a city Internet access.

The Kansas department of Health and Environment already has 115 systems using its version of E-Reporting.

KRWA commented in support of waivers for small systems that have small populations with few connections such as less than 250 population or 50 connections.

These are the larger wastewater systems with the smallest being Abilene with a population of almost 7,000; most also have activated sludge type plants with monthly or even weekly reporting. Some states have been using this process for several years and have noticed no issues. Some states have to add the E-Reporting to permits. KDHE will not need to issue new permits because the present permits include mention of possible E-Reporting. KDHE is working on the E-reporting system for the other wastewater systems and the other

reporting that will be required. When the E-Reporting is completed, KDHE anticipates having training sessions on the process with KRWA and other training providers across the State.

Charlie Schwindamann has been Wastewater Tech at KRWA since September 1999. Charlie holds Class II Water and Class I Wastewater Operator certification. He is a member of the Marysville, KS City Council.



Bartlett & West

For over 60 years — engineering clean and safe water for our communities and for you.

Water Engineering Services

- Preliminary, feasibility, and design reports
 - Water source, treatment, and distribution design
 - Long-range strategic and financial planning
- Regulatory compliance—strategies and planning
 - GIS, GPS, and specialized system modeling
 - Permitting, land rights, and easement management

1200 SW EXECUTIVE DR ■ TOPEKA KS ■ 888.200.6464 ■ BARTWEST.COM