

Chesapeake Bay Point Source Data Project: Project Summary and Recommendations for Streamlining

Introduction

This document summarizes a recommended approach to point source data submission, review, and approval for use in the Chesapeake Bay Watershed model. The Bay Program conducted interviews with each state regarding this process and the associated challenges. The Bay Program then summarized these challenges and drafted a recommendation for a new approach. The new approach has the conceptual consensus of the Wastewater Treatment Workgroup (WWTWG), while the Bay Program agreed to provide an estimated Level of Effort before officially initiating any pilot project. The Bay Program presented this Level of Effort to the WWTWG for agreement on pursuing this approach. The Bay Program asks the Water Quality Goal Implementation Team (WQGIT) to approve the approach and provide input on several issues related to implementation, including resources needed and approaches to permitting and reporting requirements.

Recommendation

Building a Tool

The Bay Program recommends creating a pre-processor to assist in QA/QC and preparation of the data for the Chesapeake Bay Watershed Model. This tool, which would acknowledge the differences in process for gathering data for significant and nonsignificant facilities, would allow the Bay Program to use data already reported in ICIS-NPDES to reduce burden associated with submitting this annual data set. Jurisdictions would have an opportunity to review data and submit corrections prior to final acceptance by the Bay Program. An initial pilot would focus first on significant facilities and leverage data directly from ICIS-NPDES. Later, the tool would be expanded to provide assistance in performing QA/QC for nonsignificant facilities not reported consistently in ICIS-NPDES.

Estimated Level of Effort for Pilot Project

CBP will plan on reviewing the progress of this project at each monthly WWTWG meeting for the project duration (anticipated one year). At least four (4) and up to six (6) additional meetings are also anticipated. It is estimated that each state will spend between 5-10 staff hours per month on this effort. CBP will fully support the development of the tool and no costs for development will be incurred by the jurisdictions. However, there may be internal jurisdictional costs associated with updating/addressing any point source data management/reporting issues that may be uncovered. CBP cannot accurately estimate this but jurisdictions are welcome to address this in their annual grant workplan submissions.

Reporting Requirements

In the long-term, the Bay Program would like to explore further the reporting requirements jurisdictions assign to nonsignificant facilities. If jurisdictions trend towards increasing reporting requirements or gathering more data for nonsignificant facilities, this data could be incorporated into the “significant facilities component” of this tool, leveraging existing data and relieving jurisdictions of the burden of

preparing this data separately. WWTWG members were more cautious about this recommendation and wished to retain the ability to submit default, or non-reported, values.

Related Experience

The Wastewater Treatment Workgroup is following on the heels of the very successful effort to transition annual reporting of BMP implementation data through each jurisdictions' NEIEN nodes. The complexity of reporting on literally hundreds of different BMPs gathered from a multitude of sources caused the Partnership to take several years to fully accomplish this electronic reporting. It truly made a difference, working collective as a partnership, resolving issues, asking for and receiving needed resources. We, as a partnership, need to take a similar approach to wastewater treatment facility data reporting—working on and resolving the issues collectively and ending up with a reporting system that saves the jurisdictions' time and staff resources.

Draft 2016 CBP Grant Guidance

The following language was included in the 2016 draft Grant Guidance (attachment 6):

Since 2014, EPA has been working through the Water Quality Goal Implementation Team's (WQGIT) Wastewater Treatment Workgroup and directly with the states and the District of Columbia on leveraging ICIS-NPDES to report wastewater facility data. The recently finalized national NPDES E-Reporting rule will bring additional changes and requirements, which will affect how jurisdictions submit their wastewater facility data. CBPO has developed a "hybrid" reporting solution that will pull data directly from ICIS-NPDES but also allow states the opportunity to review, supplement, and quality assure their data through a separate tool and interface managed by CBPO. Development of this tool is anticipated to be complete in 2017.

CBPO is asking the jurisdictions to complete their transition to utilizing this new approach (which includes reporting of data in ICIS-NPDES) and, beginning with their 2017 progress data submission, submit their wastewater treatment facility data this way. The specific requirements and guidelines for these submissions, including how non-significant facilities will be addressed, will be reviewed and finalized with the jurisdictions' input working through the WQGIT's Wastewater Treatment Workgroup.

Input Needed: Conceptual Consensus and Resource Availability

The Bay Program seeks the leadership of the WQGIT in demonstrating the priority of this project and in recognizing the benefits it will provide.

- Does the WQGIT endorse this recommended approach?
- What other POCs or groups should the Bay Program be coordinating with?
- Does the proposed approach support or conflict with other efforts to implement the NPDES e-Reporting rule?
- Is the language in the 2016 draft Grant Guidance in line with this effort?
- Are there any funding streams or grant avenues that jurisdictions should pursue separately from Bay Program grants and 106 grants?

Milestones

- January 2016: Build consensus on a path forward
- January 2016: Identify funding opportunities, including priority tiering for Exchange Network grants

- February 2016: Begin development of any needed systems or tools
- June 2016: Update 2017 Grant Guidance as needed
- Fall 2016: Begin testing tool
- 2017: Implement new tool in reporting practice