Texas Electronic Reporting System

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October 21, 2022

TPDES Stormwater General Permits

Construction
NOIs: 30,172
Waivers: 19

Industrial
NOIs: 7,572
NECs: 2,644

Municipal
Phase II
NOIs: 527
Waivers: 42

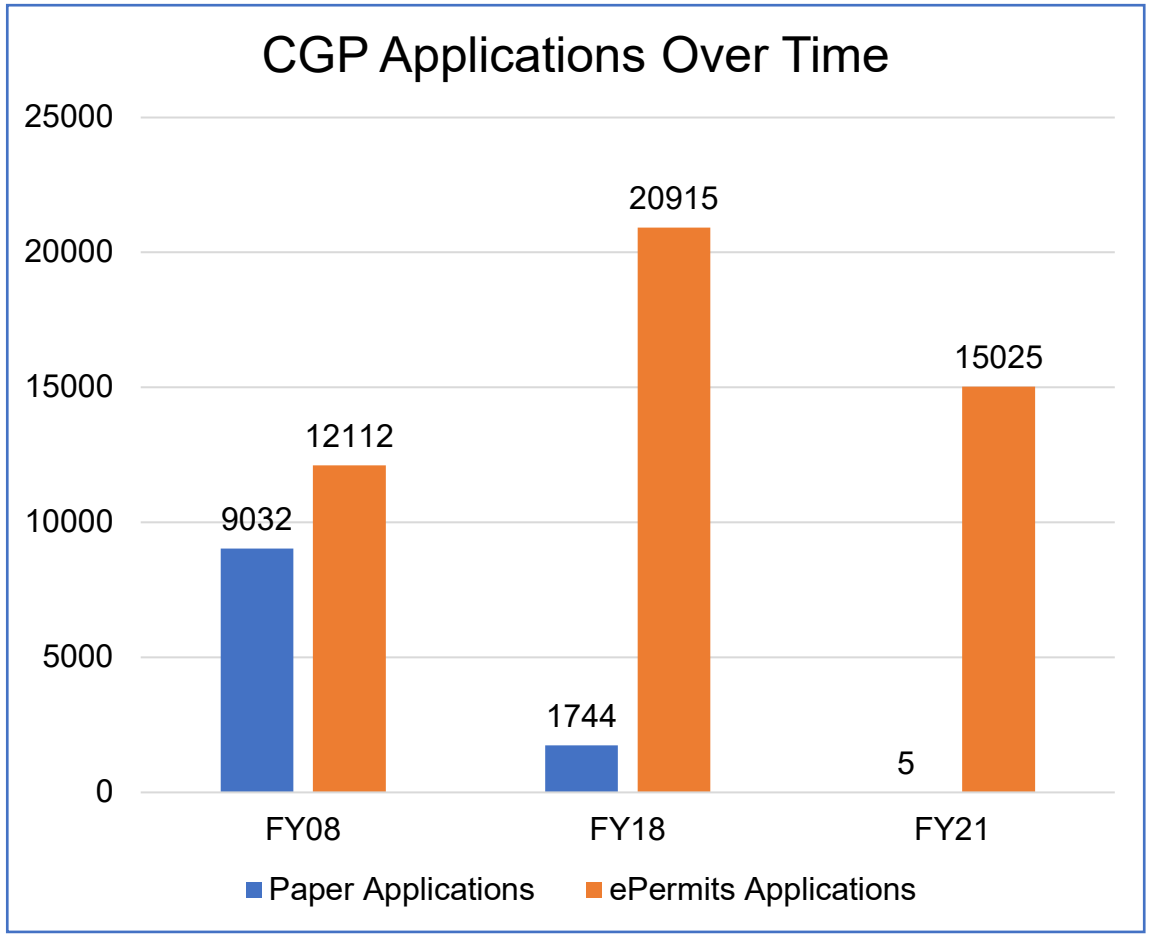
Electronic Permitting - STEERS

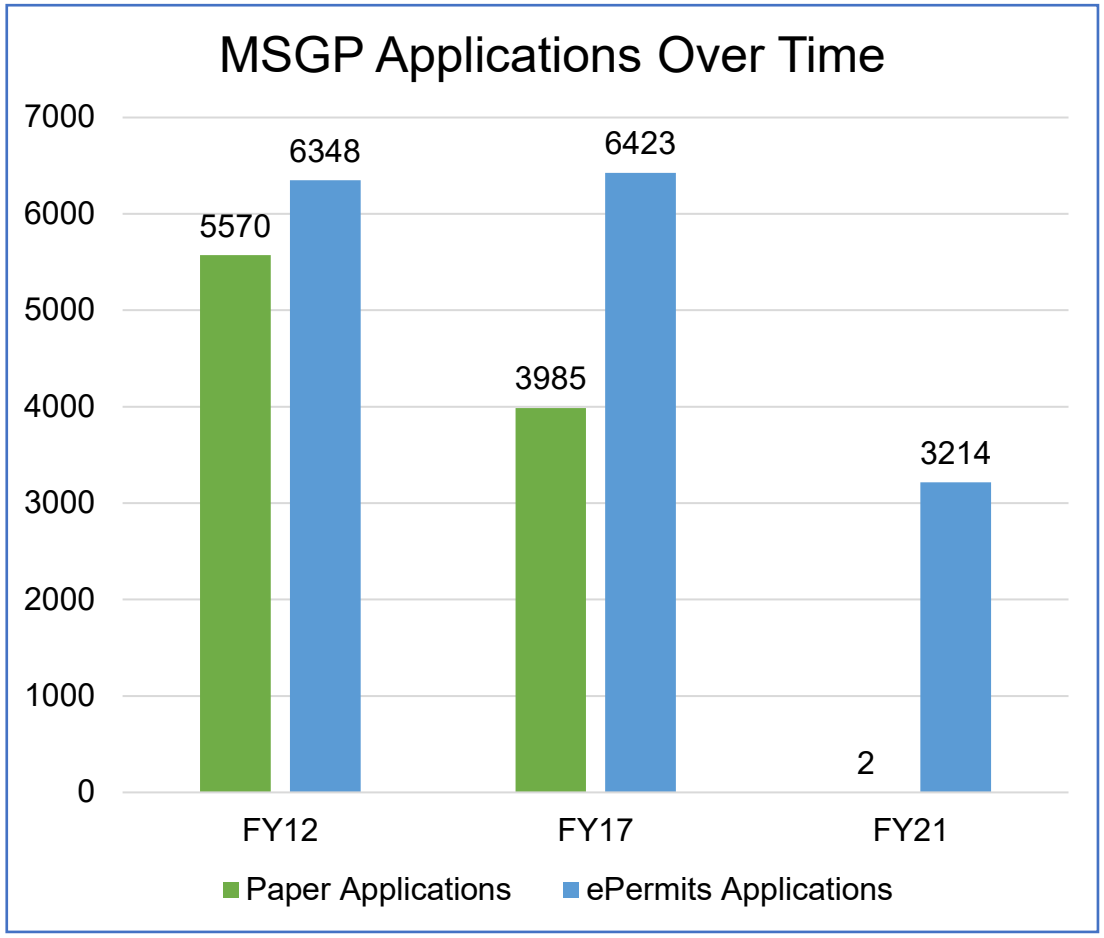
- TCEQ receives and processes thousands of registrations and permit applications each year.
  - Created the ePermits system to automate the process of creating and managing authorizations, registrations, and permits.
- The State of Texas Environmental Electronic Reporting System (STEERS) is a vehicle to collect data electronically.
  - Provides a common framework and security for multiple agency programs that enable the regulated entities to submit permits and registrations electronically.
  - Meets EPA CROMERR requirements and requires users to establish an account and an electronic signature.

Why Was It Developed?

- ePermits is actually two separate systems and the main reason to develop the system was two-fold:
  - *Internally* - it allows staff to create and maintain electronic applications and data.
  - *Externally* – it allows customers to select, complete, and submit an electronic application.
- ePermits includes two stormwater general permits
  - CGP – available March 2008 and mandatory September 2018
  - MSGP – available August 2011 and mandatory September 2017
    - Note: Phase II MS4 General Permit applications are not submitted in ePermits
- The ePermits system allows TCEQ to process a high volume of applications (NOIs, NOCs, NOTs) in a timely fashion.

ePermits Usage





What Programs are in ePermits?

- ePermits was created to serve for users to:
  - **Create New Authorizations**
  - **Modify Existing Authorizations**
  - **Renew Authorizations**
  - **Terminate Authorizations**
  - **Share/Access In-Progress Authorizations**
  - **View Application documents – including authorization Certificates and Letters**

Key Features of ePermits

- Strictly follows Signature Authority Standards in federal and state rules
- One time account set up and authenticated sessions
- Seamless permit application process for any program type or general permit type
- Guided Task list details each section that needs to be entered by the user
- Copy information from an existing application with minimal data entry
- Help links to complete the application in a single session
- Customer Validations and potential duplicate checks
- Compliance History and Delinquent Fees validation
- Efficient search functionality and filtering techniques

Challenges

- User Characteristics
  - Internet availability and customers' ability to use computers.
  - Customers are expected to have some knowledge of the program areas they use.
  - STEERS Participation Agreement (SPA) – requires a valid Texas drivers license
- Data Integrity
  - Data is directly entered by the customer. The customer has a vested interest in entering the data correctly in the system.
  - Data must meet several minimum validation standards before it can be submitted to the agency.
  - Customer Validations against Secretary of State and Comptrollers databases.

Challenges

- Application specific:
  - Missing site information or incorrect site addresses.
  - Customers wait until the last minute to renew their applications.
  - Failure to login successfully locks the account.
  - Role based access – preparer versus signatory.

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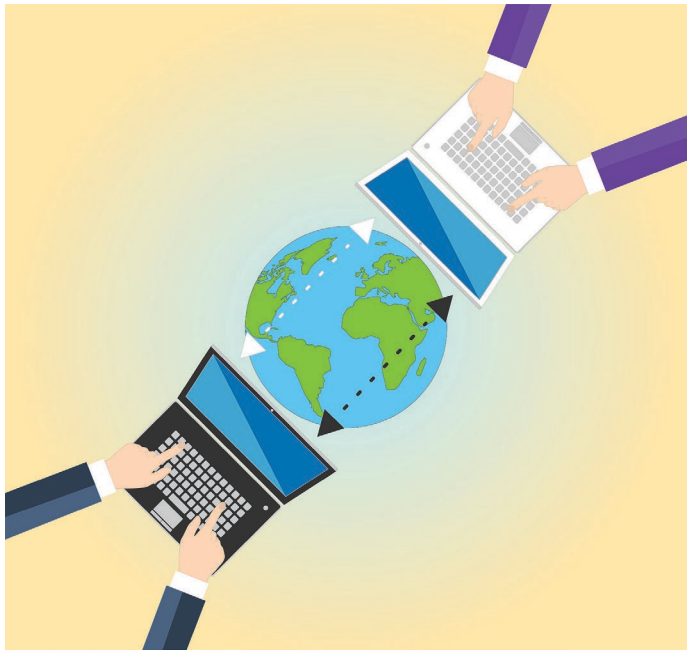
Present and Future

- Electronic Reporting Rule and General Permits
  - All applications for general permits need to be submitted electronically
- 2021 Multi-Sector General Permit
  - As of Sept. 1, 2017, requires that all applications be submitted electronically
  - Only received a small number of paper applications with a valid electronic waiver
- 2018 Construction General Permit
  - As of Sept. 1, 2018, requires that all applications be submitted electronically
  - Only received a small number of paper applications with a valid electronic waiver
- Stormwater Processing Center
  - Less paper applications to process
  - More time is required on customer service to assist customers using ePermits
  - Focusing on data cleanup

Sharing Data with EPA

- Data from the permits submitted in the ePermits system (by both applicants directly and staff entering paper applications) is shared with EPA's Integrated Compliance Information System (ICIS) database
- Data is pushed to ICIS using the Texas Integrated Data Exchange Node (TIDEN)
  - Data is sent to ICIS nightly
  - Staff manually push data from Notice of Change applications



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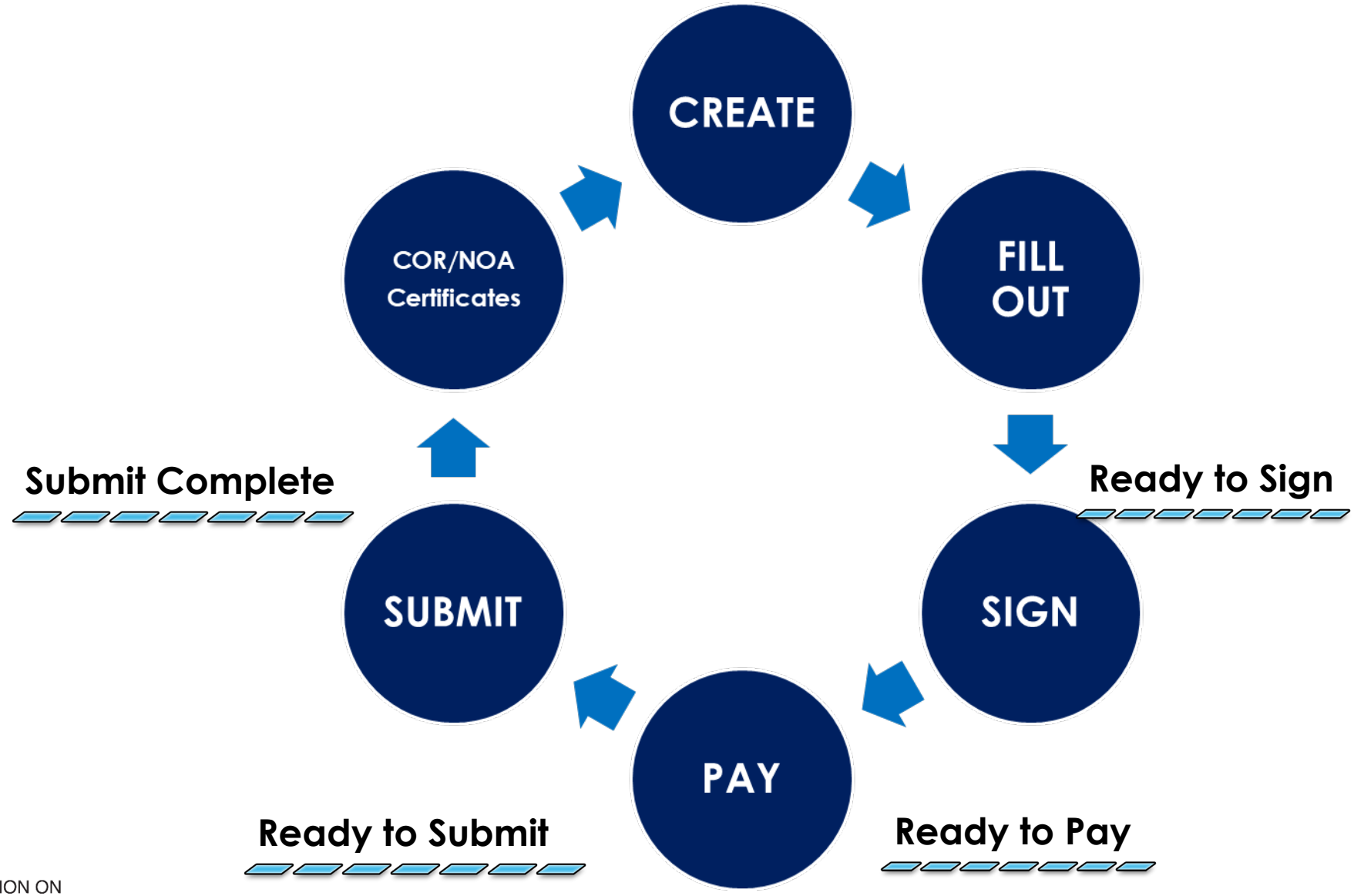
New eReporting Progress

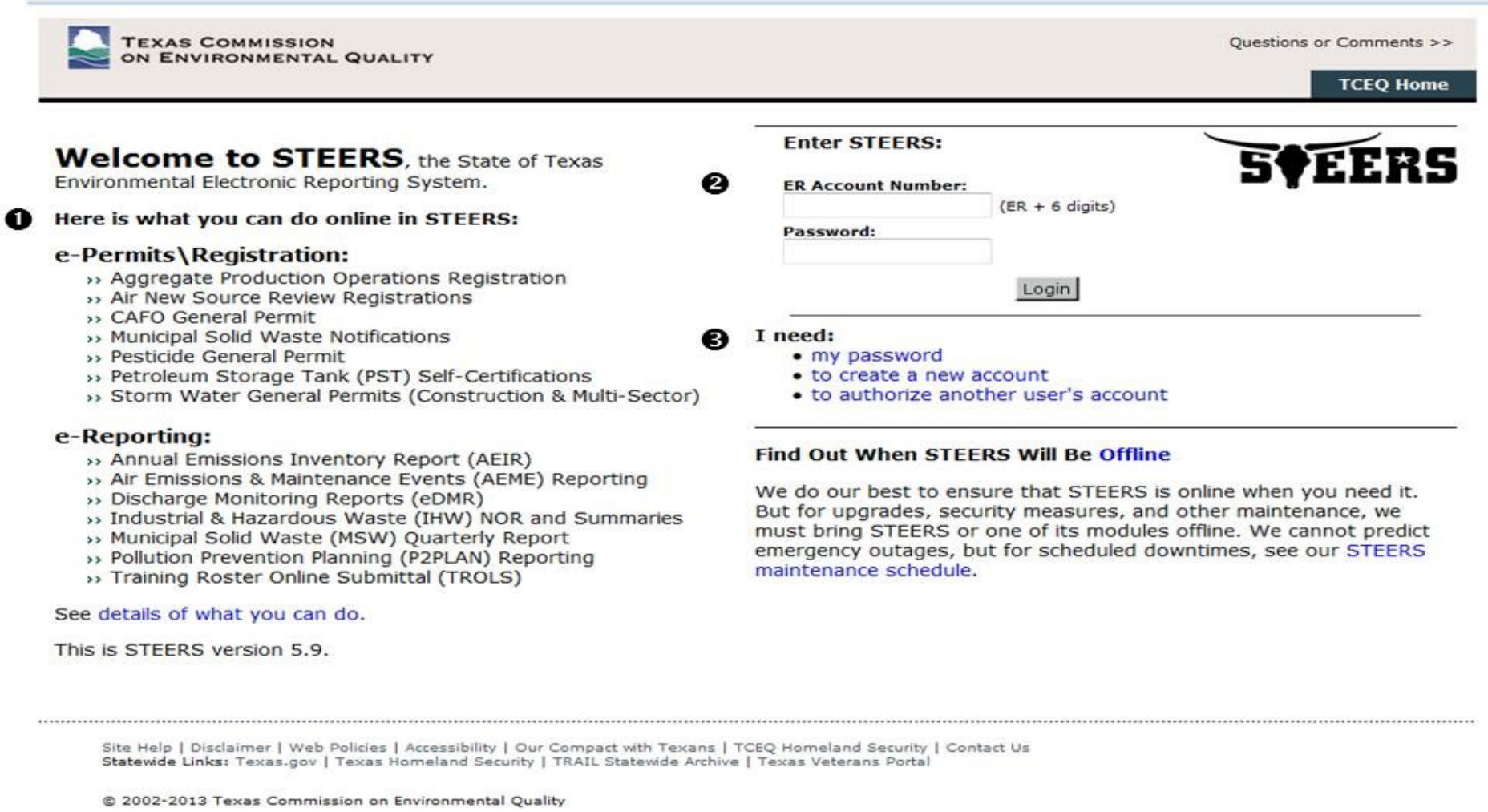
- As of April 1, 2022, all MSGP monitoring data must be submitted electronically in NetDMR
- Delegation of Signatories Submitted in STEERS
  - All MSGP permittees must submit delegation of signatories electronically as of August 14, 2021
  - All large construction site operators will be required to submit delegation of signatories electronically as of March 5, 2023
- Phase II MS4 Applications and Reports will be submitted in EPA's NeT-MS4 system in 2024
  - Due to complexity of MS4 applications and TCEQ resource demands, TCEQ is opting now to use EPA's system rather than implement this program in the STEERS/ePermits system

A Look Into STEERS/ePermits

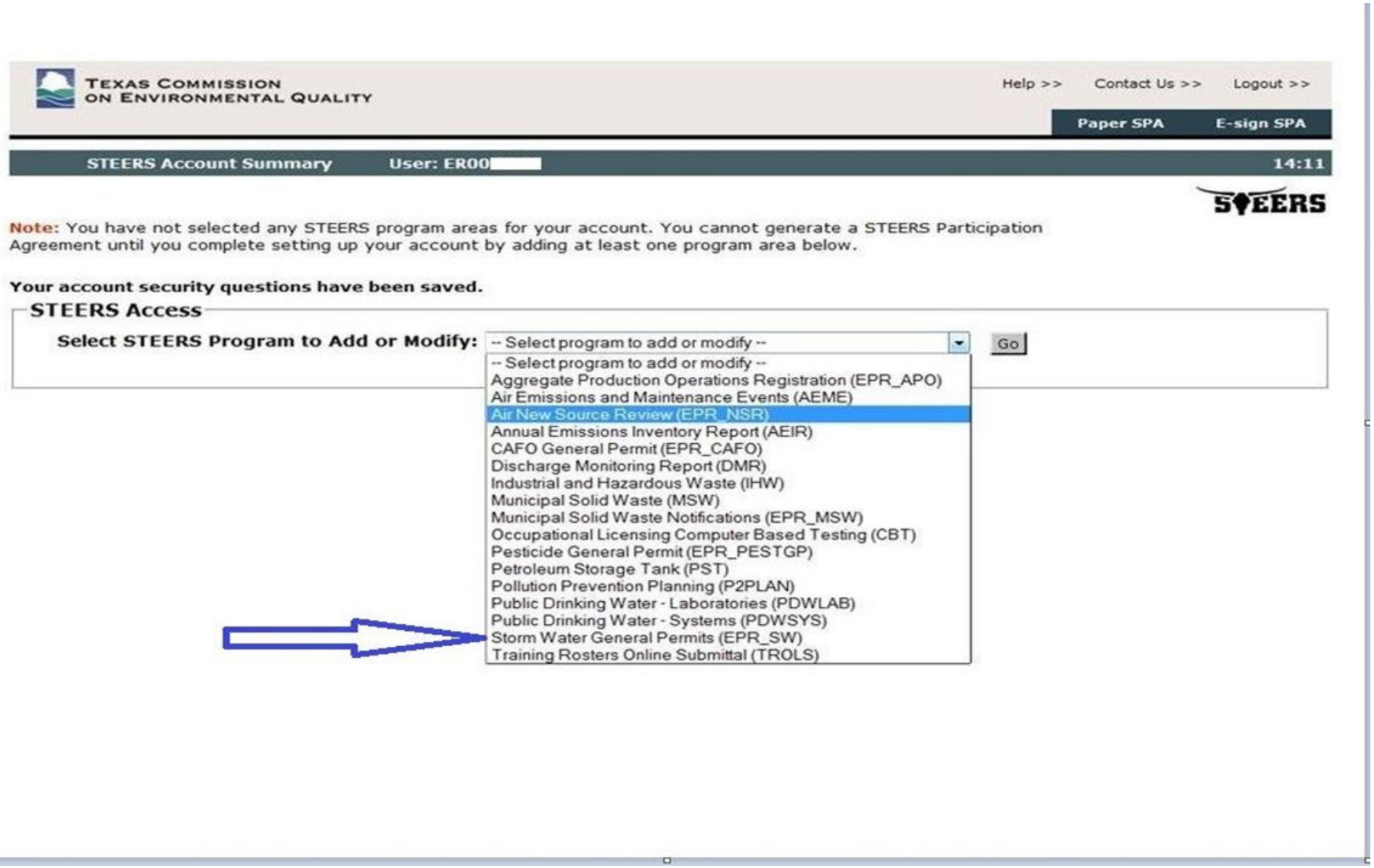
Permit Application Cycle



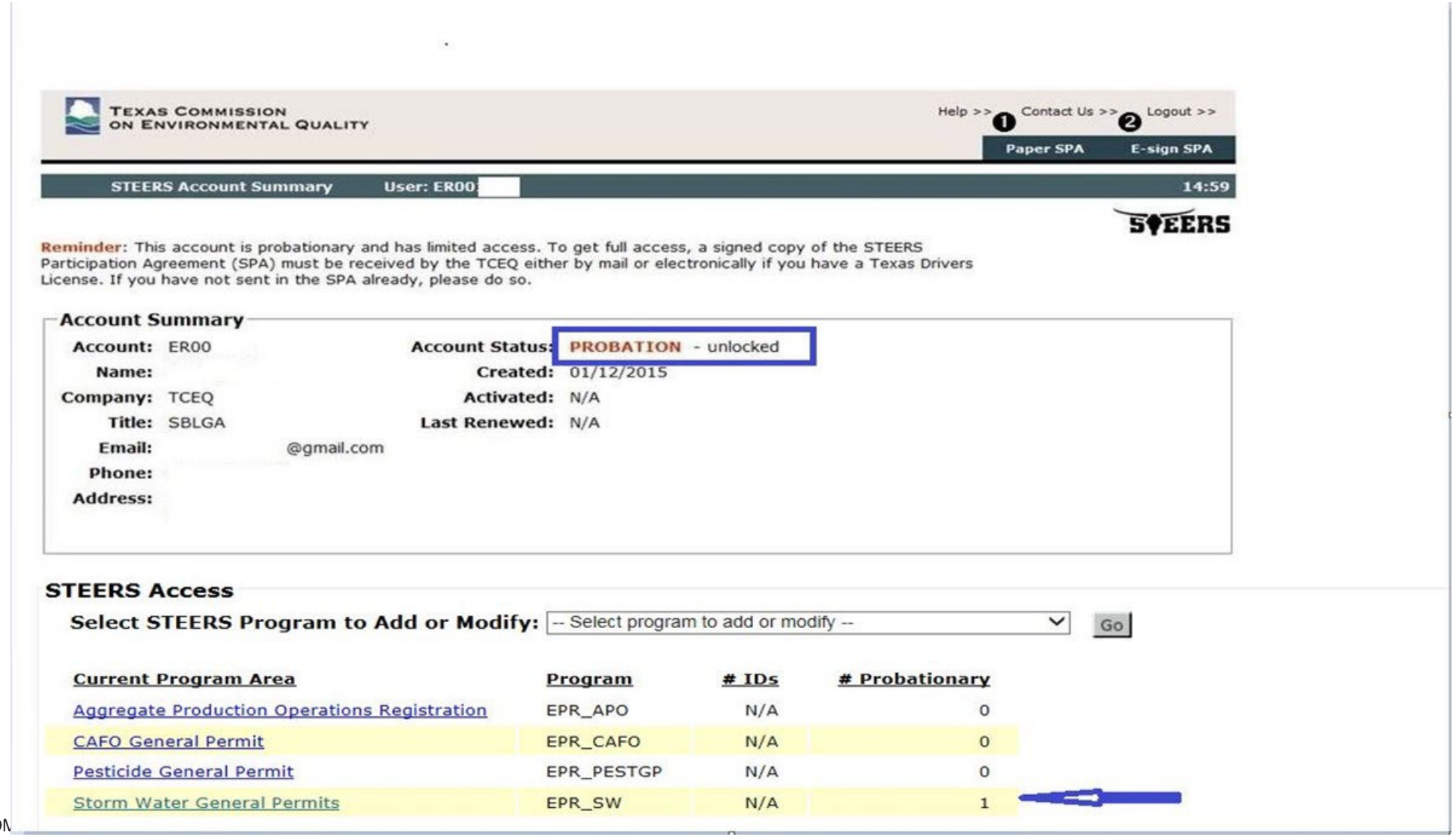
Welcome to STEERS



Add Program Page



STEERS Participation Agreement (SPA)



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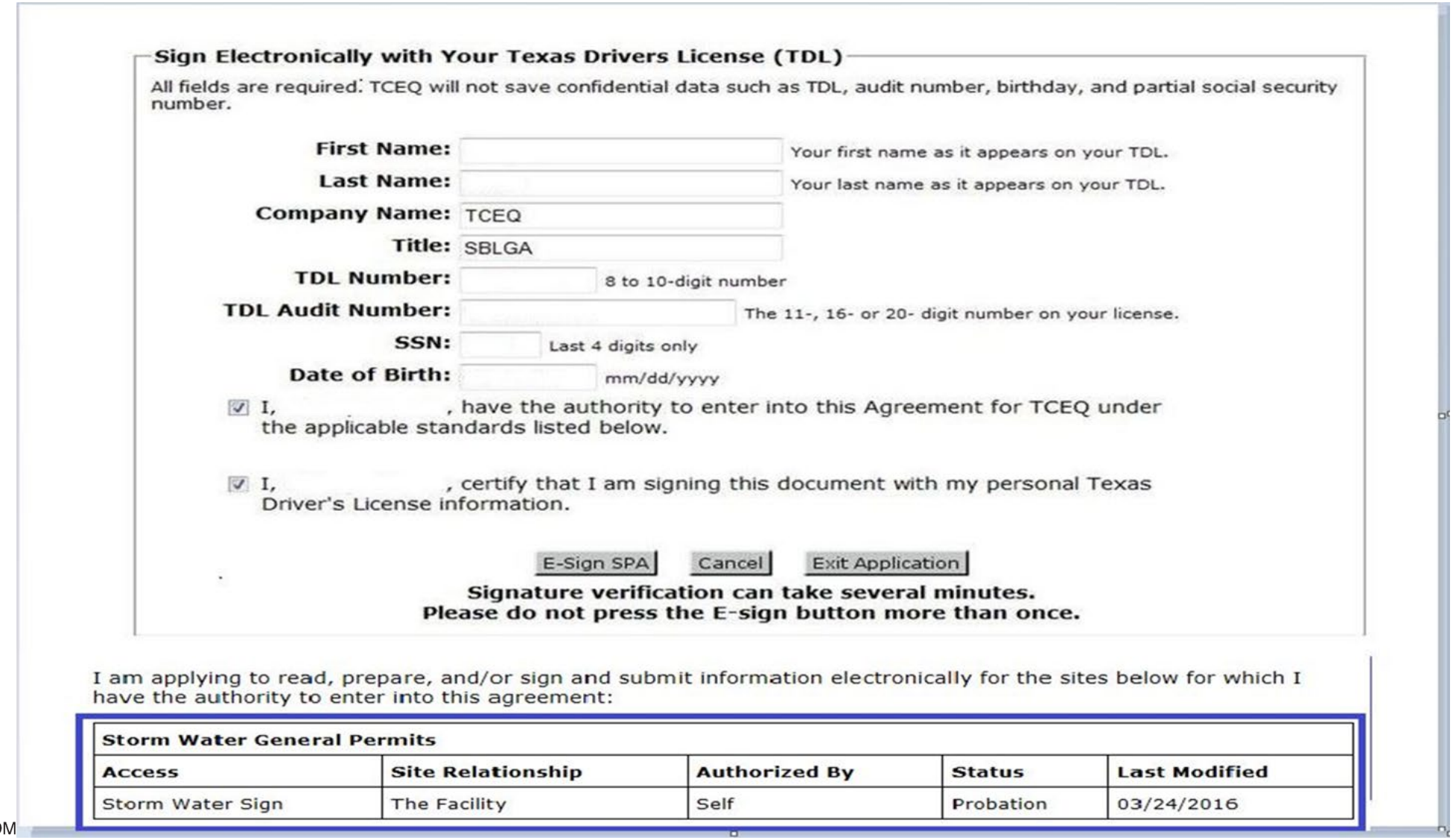


Sign Electronically with Your Texas Drivers License (TDL)

All fields are required. TCEQ will not save confidential data such as TDL, audit number, birthday, and partial social security number.

First Name: Your first name as it appears on your TDL.

Last Name: Your last name as it appears on your TDL.

Company Name: TCEQ

Title: SBLGA

TDL Number: 8 to 10-digit number

TDL Audit Number: The 11-, 16- or 20- digit number on your license.

SSN: Last 4 digits only

Date of Birth: mm/dd/yyyy

☑ I, , have the authority to enter into this Agreement for TCEQ under the applicable standards listed below.

☑ I, , certify that I am signing this document with my personal Texas Driver's License information.

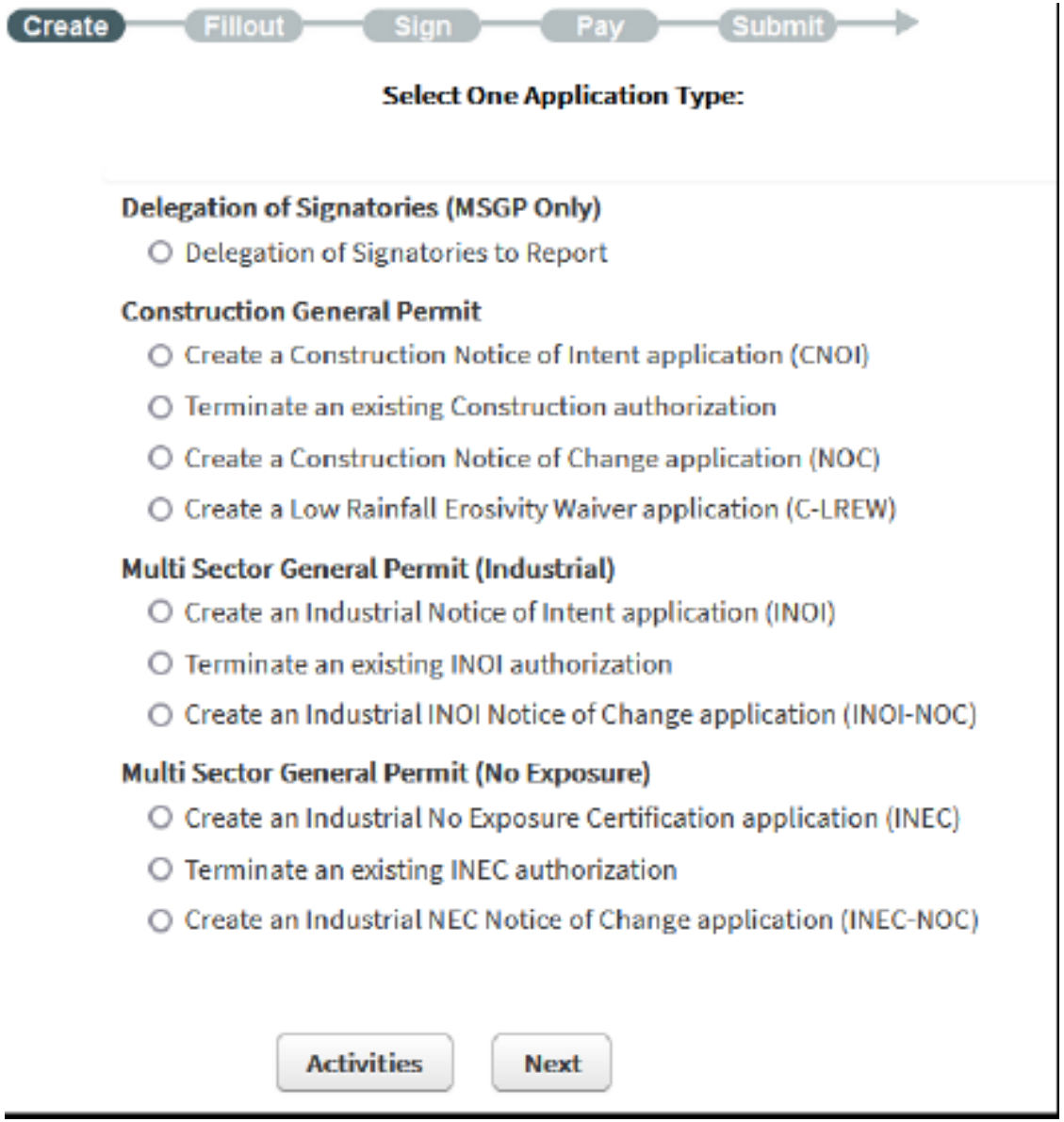
E-Sign SPA | Cancel | Exit Application

Signature verification can take several minutes.
Please do not press the E-sign button more than once.

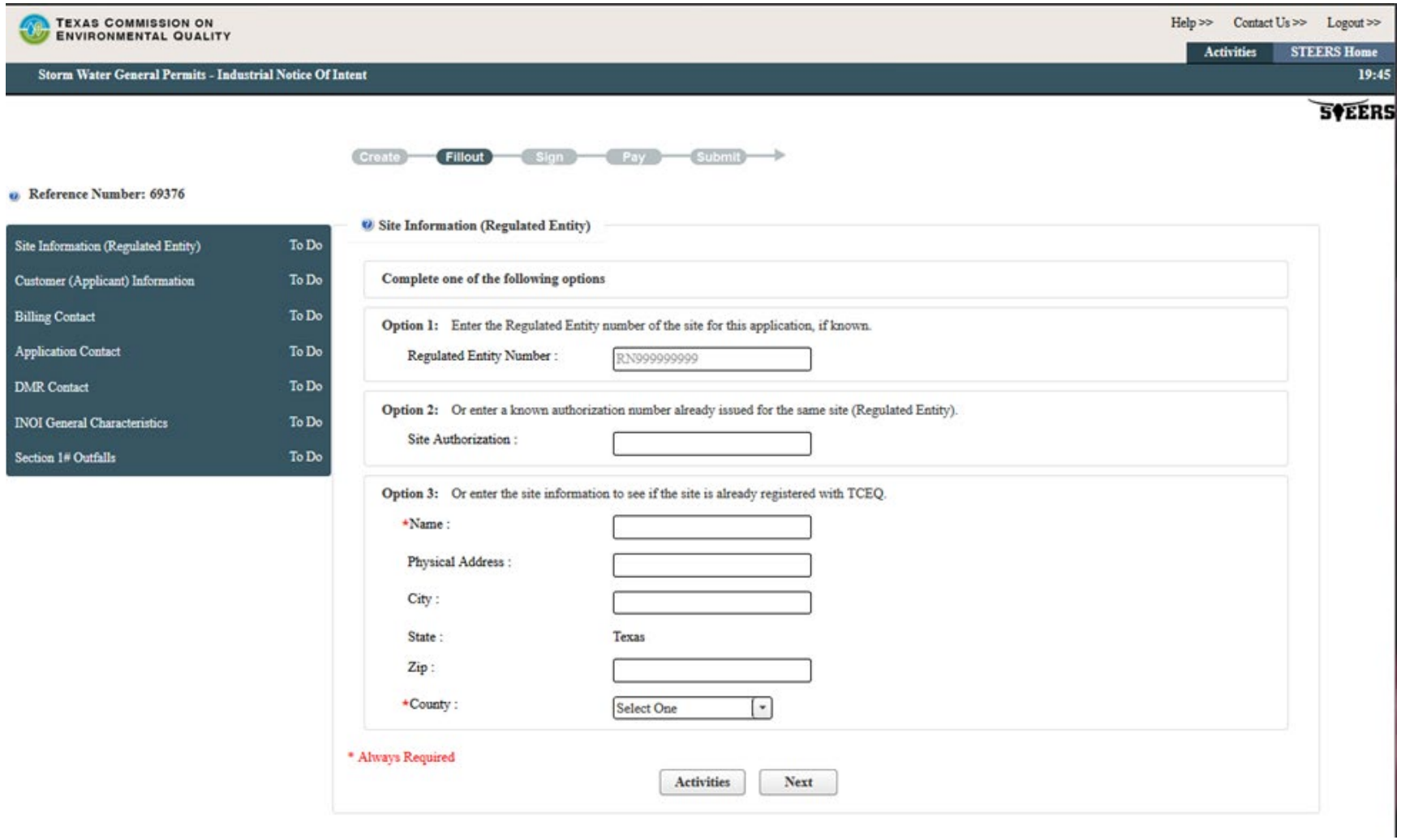
I am applying to read, prepare, and/or sign and submit information electronically for the sites below for which I have the authority to enter into this agreement:

Storm Water General Permits				
Access	**Site Relationship**	**Authorized By**	**Status**	**Last Modified**
Storm Water Sign	The Facility	Self	Probation	03/24/2016

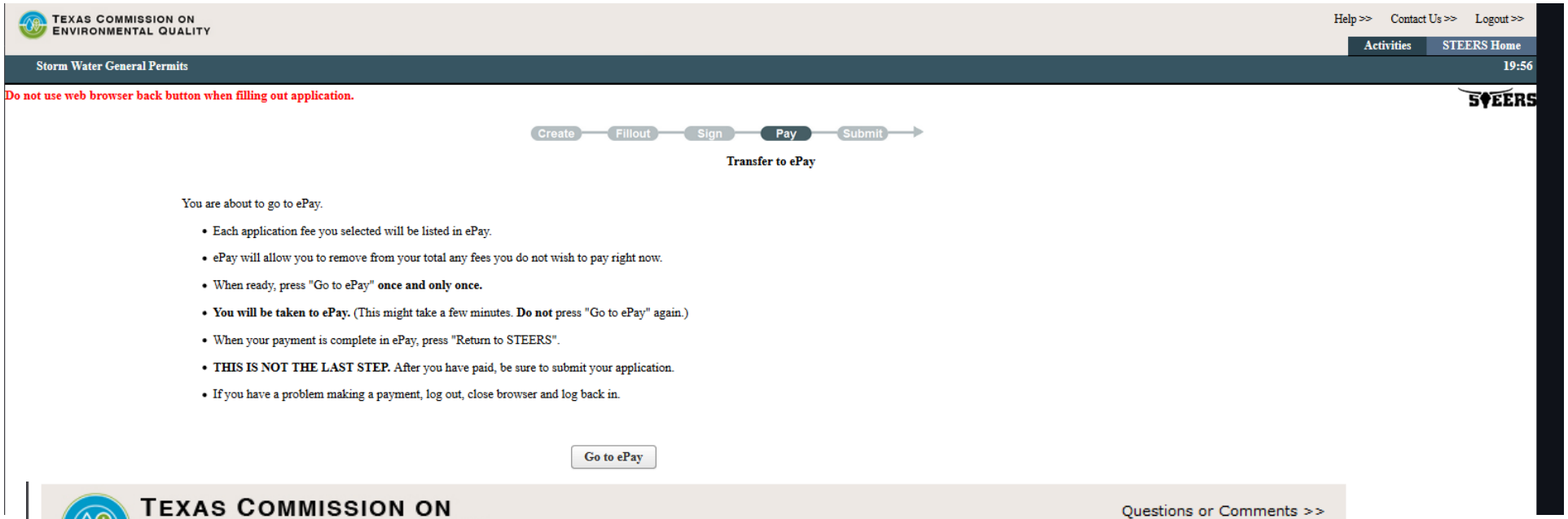
Prepare Application – Select Application Type

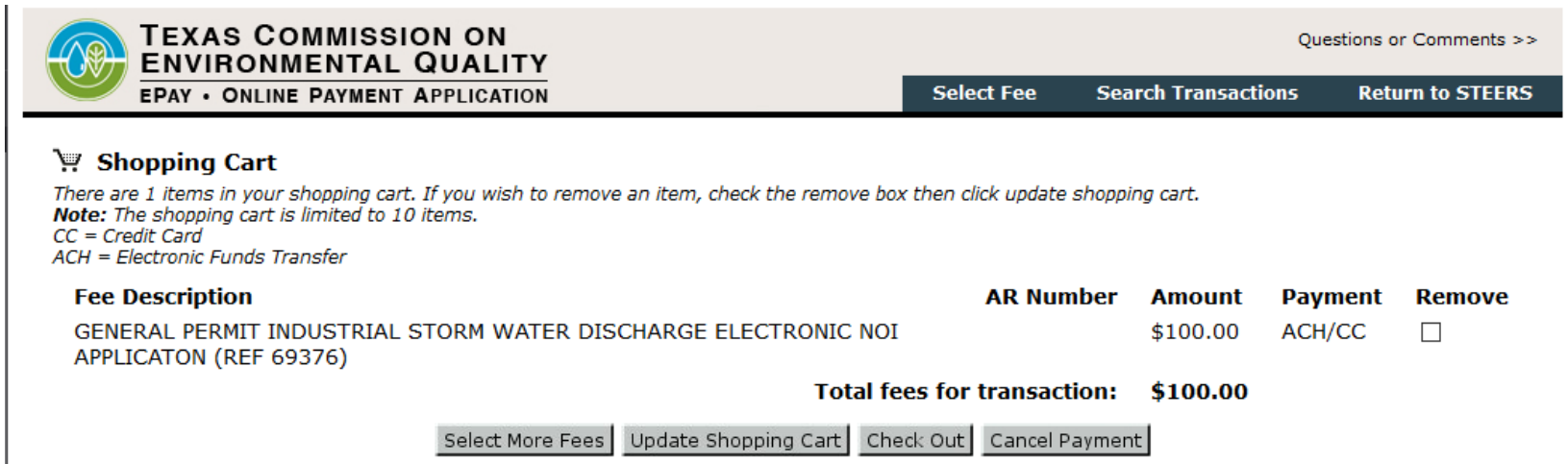


Site Information



ePay – Payment Portal to Pay by Check or Card

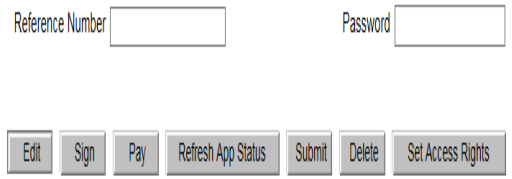


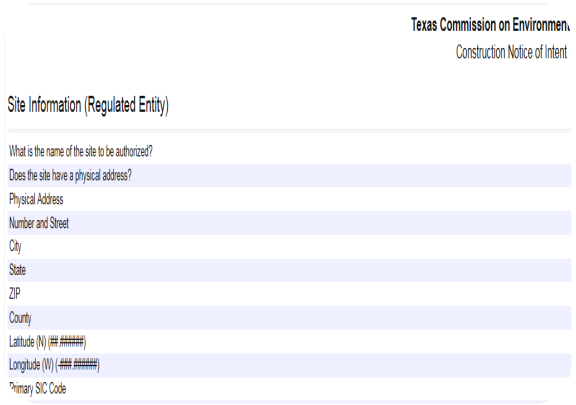


Summary

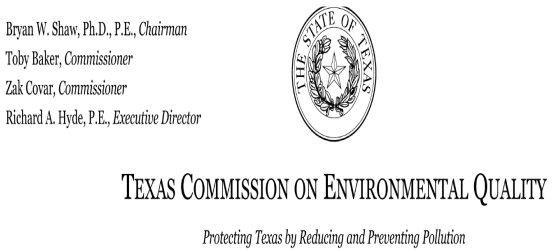
Copy of Records

Access_Permit

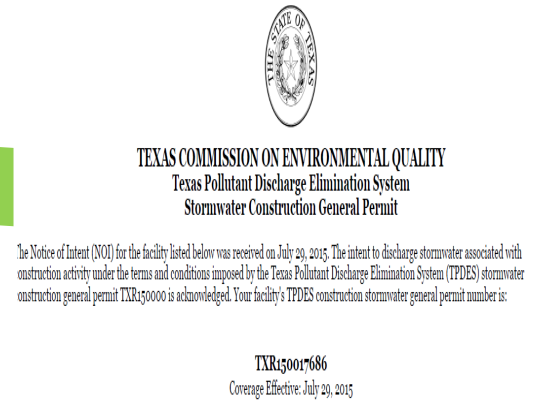




Notice of Intent (INOI-R) Approval Letter



INOI- R Certificate



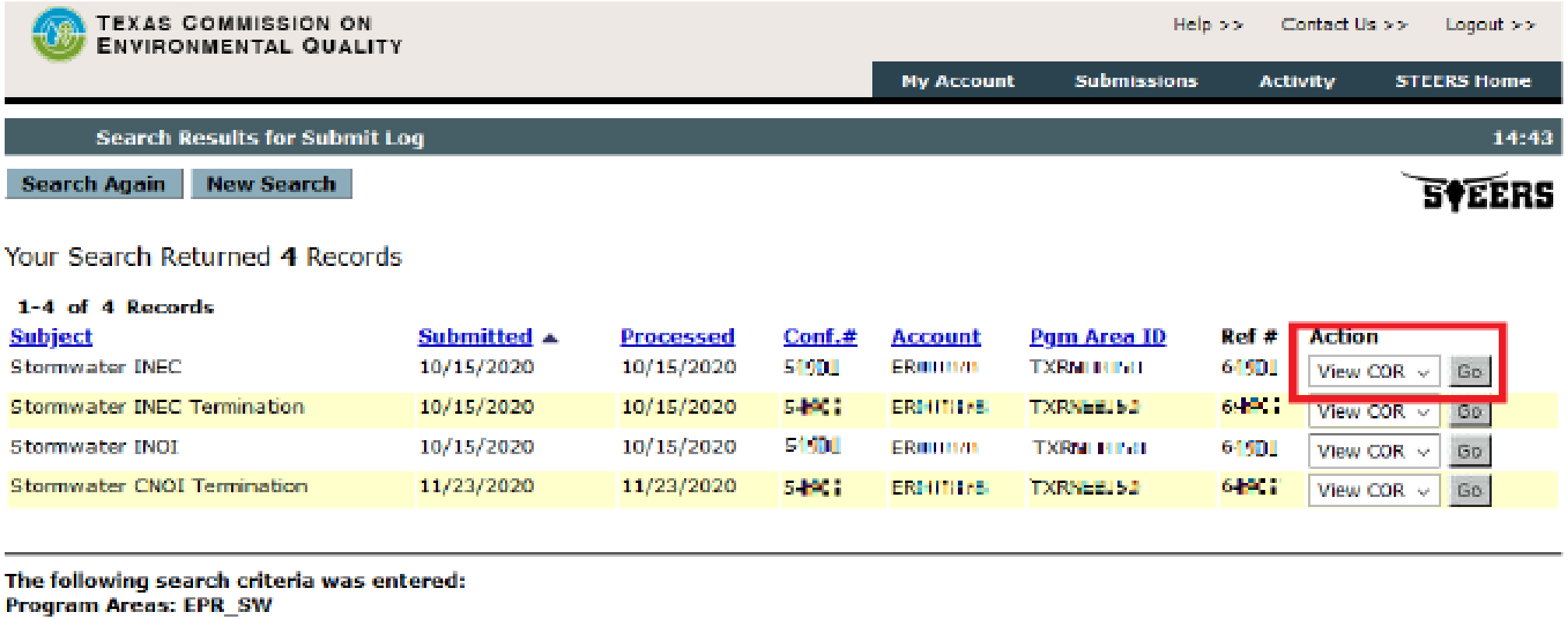
INOI- R
TXR051234
Permit application

ER001234

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

TCEQ

Inside STEERS Submissions



Thank you!

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