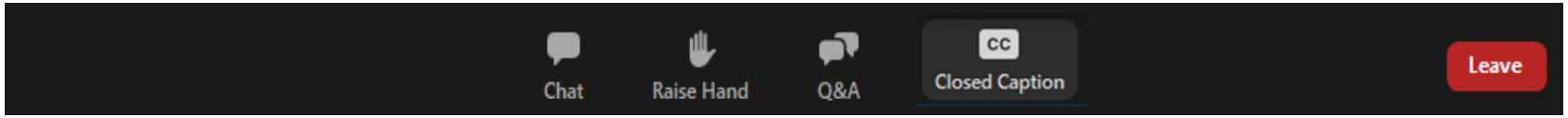
Utah NeT Pesticide General Permit (PGP) Training

Wednesday, Feb 15, 2023, at 1 - 3pm MT

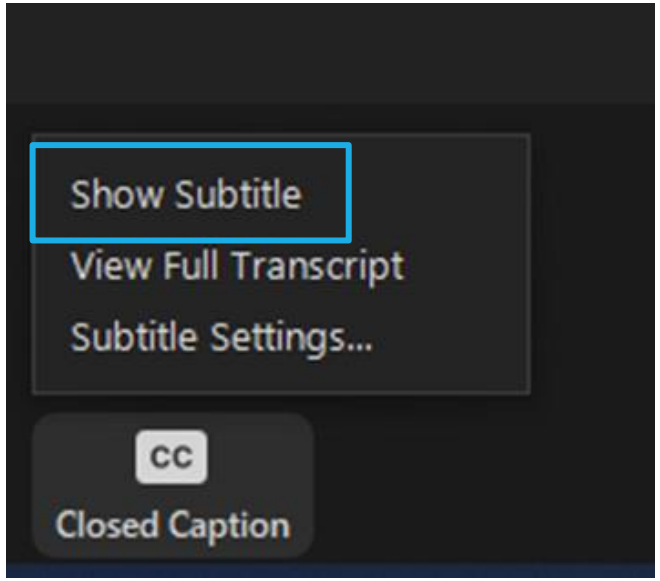
AUDIO INSTRUCTIONS

You are in listen-only mode (muted).

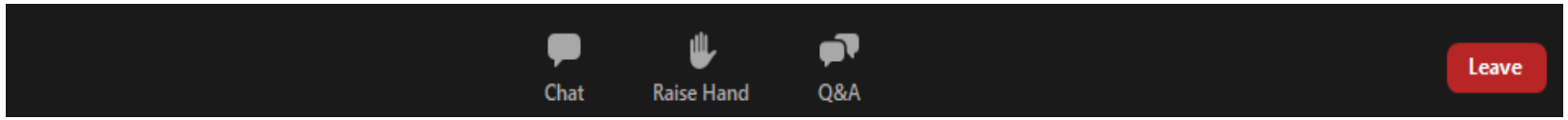


- Closed Captioning for today's Webinar is available by clicking the "Closed Caption" button on your toolbar.

*For your awareness, this training is being recorded.



VIDEO INSTRUCTIONS



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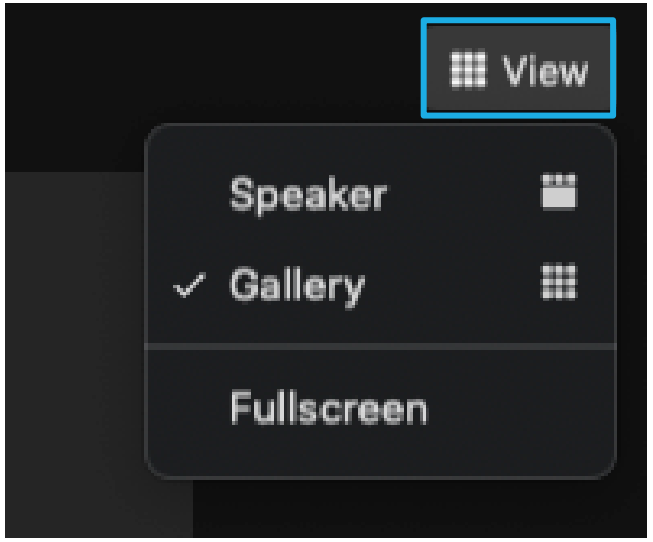
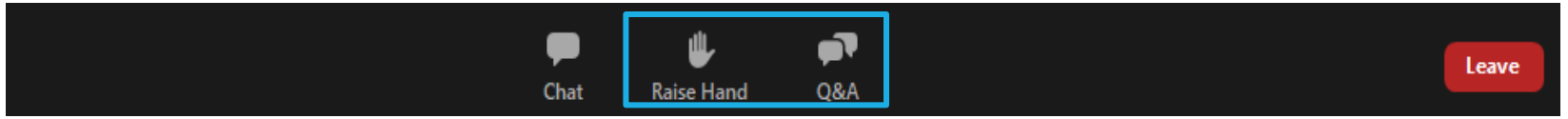
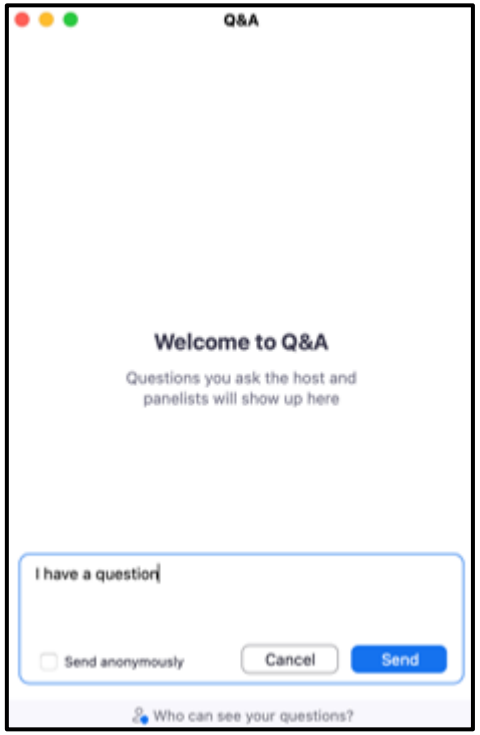


QUESTIONS DURING THE WEBINAR



- All attendees are in listen only mode
- Please enter your questions in the **Q&A pod** and we will be monitoring them throughout the webinar (and have time at the end for Q/A)
- Please **raise your hand** if you would like to be un-muted to ask your question verbally



Introductions

EPA HQ - Office of Compliance:

- Lauren D'Angelo (Product Owner for NeT PGP)
- Madeline LaPatra (NeT PGP Trainer)

- Utah DEQ Regulatory Authority (RAs):
  - Don Hall
  - Susan Woeppel
  - Alex Heppner
  - Clanci Hawks

Agenda

- Why Electronic Reporting/ NeT – Alex
- Reminder of Deadlines and Payment Update – Don
- Creating a CDX Account and Accessing NeT PGP – Madeline
- Submitting electronic NOI – Madeline
- Pesticide Discharge Management Plan Requirements – Don
- How to Submit Change NOIs and NOTs – Madeline
- Annual Report & Incident Report – Madeline & Don
- Resources – All
- Q&A – All

Utah PGP:
Electronic Reporting Rule

Electronic Reporting Rule

The Electronic Reporting rule (NPDES eRule) helps EPA and states clean up the nation's waters through:

- **Automation**
  - Shifting from paper to electronic reporting.
- **Time Savings**
  - Time and resources for the regulated community and states can be shifted to other program areas.
- **Improved Transparency**
  - Serves to elevate the importance of data and environmental performance.
- **Modern Technology**
  - Tools increase data accuracy, timeliness, completeness, and consistency for the NPDES program.

NeT

NPDES eReporting Tool

Utah PGP:
Reminder of Deadlines

Pesticide General Permit (PGP) Overview

- The permit was renewed on October 1, 2022.
- The PGP will terminate on September 30, 2027.
- The permit can be found at: https://deq.utah.gov/water-quality/updes-permitting-program#general-pesticides
- The State Pesticide Rule and be found at: Utah Administrative Code (UAC) R317-8-9.
- Utah's PGP is a NPDES-based permit which requires eReporting in the NPDES eReporting Tool (NeT) for NOIs, NOTs, permit forms, and reports.

Utah NeT PGP Deadlines

- NOIs should have been submitted in NeT **January 1, 2023**, even if an NOI was submitted on paper. Please submit ASAP if you have not done so (18/75. 20%).
  - You will receive a new NPDES ID when you submit electronically
- Pesticide Discharge Management Plans (PDMPs) must be submitted at the time of NOI submission in NeT.
- NOTs, Annual Reports, and Incident Reports must be submitted in NeT PGP, as required.
  - NOTs when terminating permit coverage
  - **Annual Reports by February 28th each year**
  - Incident Reports as needed.

Utah PGP Deadlines

- Permittees with Utah Lake applications will need to submit 2-Day Treatment Notifications and Monitoring Reports directly to Don Hall's email, dghall@Utah.gov, not NeT PGP, at least two days prior to a treatment.
- Monitoring reports are due the 28th for any previous month's monitoring, submit to Don Hall's email.

Annual and Incident Reports

Annual reports for calendar year 2022 are **due Feb 28, 2023**

- The reports must be submitted in NeT PGP
- The following operators are required to submit annual reports:
  - Large applicators as defined in the permit
  - Operators with incidents and incident reports
  - Operators that apply to Utah Lake

Incident reports must be submitted into NeT PGP within 5 days of the incident

Permit Fee Payment Reminders and Deadlines

- Annual permit fee payments are recorded in NeT PGP by DWQ.
  - Permittees will not be able to record their own fee payments in NeT until August 1, 2023.
  - Please do not make any payments, (unless you are a brand-new operator seeking permit coverage).
  - DWQ has received fees for FY23 from all known operators.
- The next annual fee will be due **September 1, 2023**, which covers the upcoming Fiscal Year 2024 (July 1-June 30).
  - Invoices for Fiscal Year 2024 permit fees will be sent August 1, 2023.

Payment Reminders and Deadlines, cont.

- At this time, NeT asks for a prorated permit fee. Do not pay a prorated fee unless you are a new operator and have contacted DWQ.
- Payments for FY 2024 should be made through the Chase Bank payment portal.
- Please contact Don Hall or Susan Woeppel for permit fee questions.

NOIs Approved in NeT PGP, as of 2/15/23

Tooele County Weed

South Salt Lake Valley Mosquito Abatement District

Utah County Mosquito Abatement District

Tooele Valley Mosquito Abatement District

Box Elder County Mosquito Control

Salt Lake City Airport

West Millard County Mosquito Abatement District

Box Elder County Weed Department

Uintah Mosquito Abatement District

Emery County Weed

Davis, Weber Counties Canal Company

Magna Mosquito Abatement District

Cache County Vegetation Management Division

Weber Mosquito Abatement District

Weber Basin Water Conservancy District

Carbon County

Salt Lake City Mosquito Abatement District

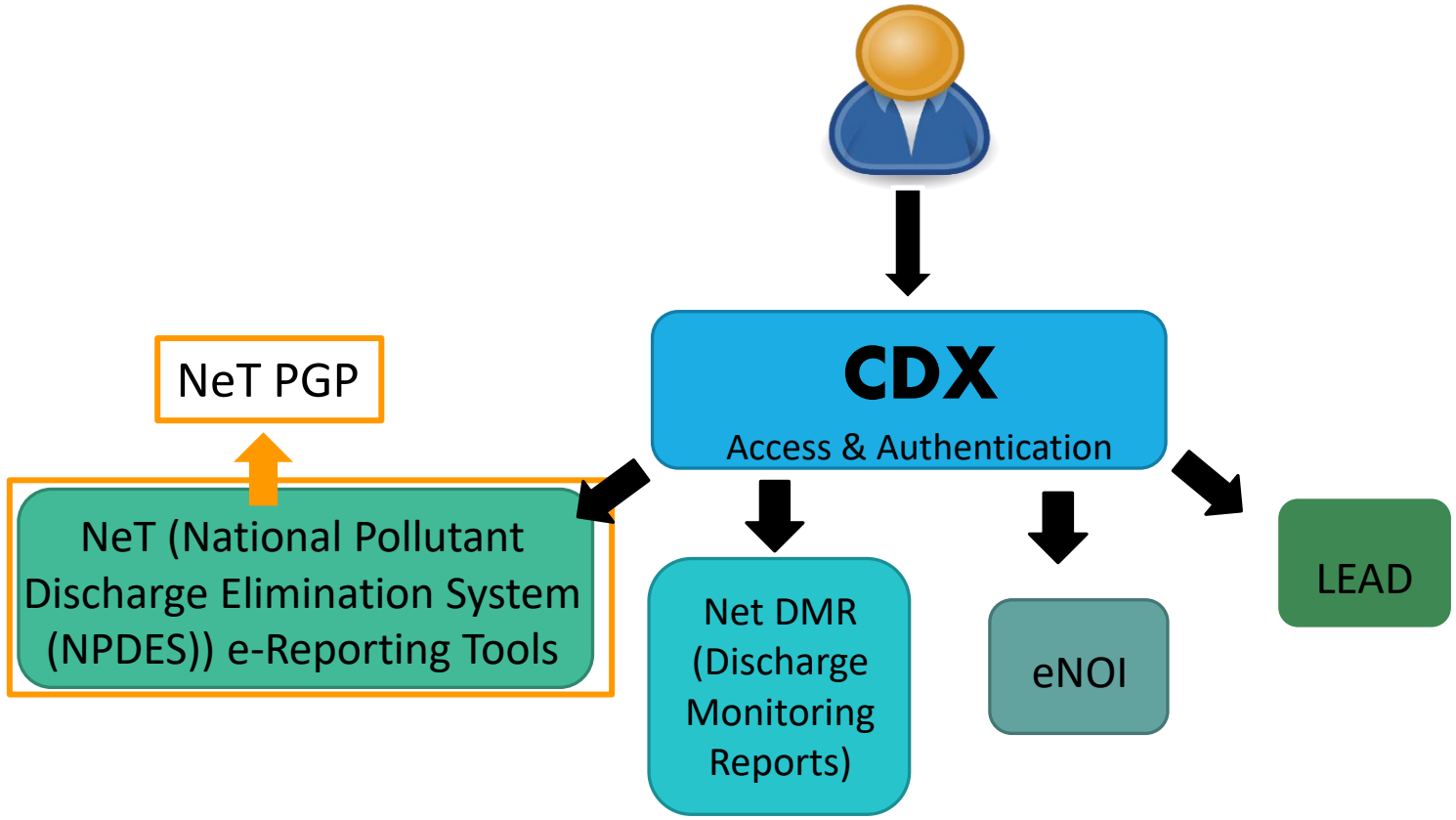
Southwest Mosquito Abatement District

CDX and NeT Review

What is CDX?

Environmental Protection Agency (EPA) Central Data Exchange (CDX) is the Agency's electronic reporting site

Uses "Signature Agreement" to authenticate and authorize users who 'certify' data



Roles and Permissions

Roles	Description	Available Permissions
Signatory	Individual who will be signing/certifying submissions or managing facility user permissions. Signatories can also prepare forms.	View, Edit, Sign, Manage
Preparer	Individual who will be viewing and editing forms. Preparers are not authorized to sign and certify forms.	View, Edit
Regulatory Authority (RA)	In the Actions Center, RA's can approve, deny, hold or remove hold for New NOIs, Change NOIs, Renewals and NOTs. RA's can also approve permission requests.	View

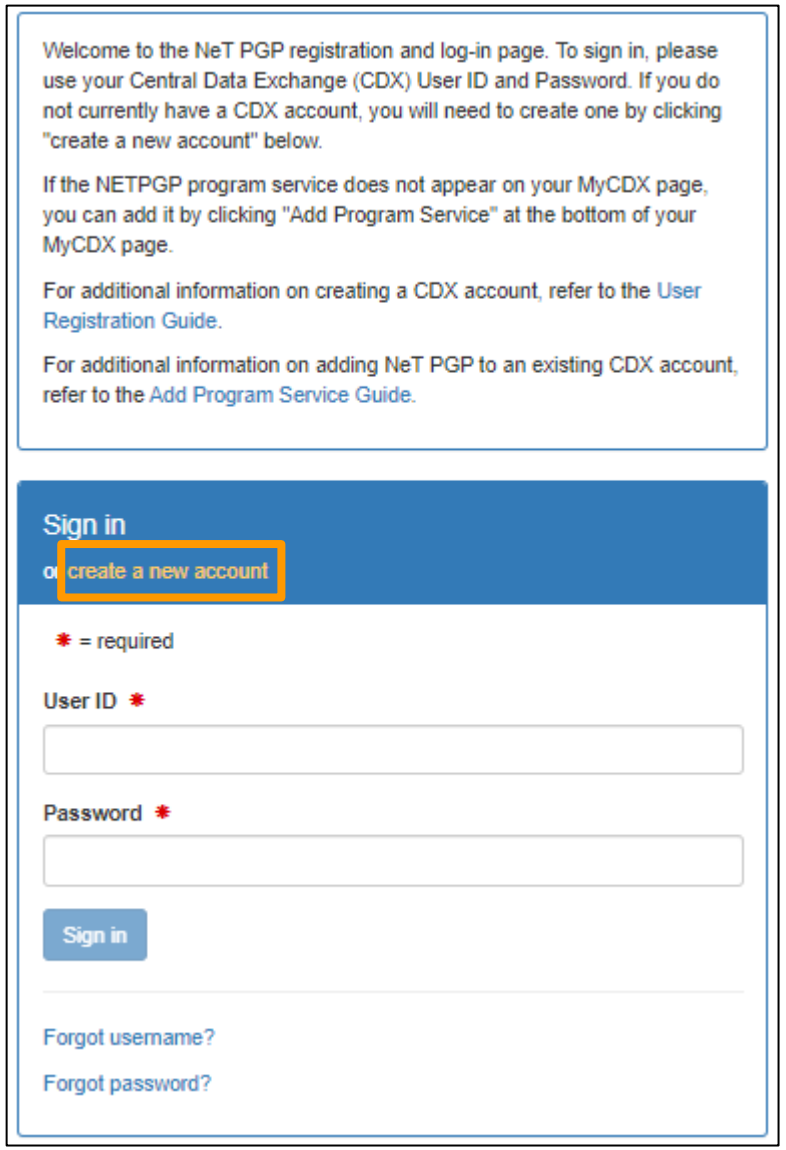
Creating a CDX Account and Accessing NeT PGP

User Registration to Create a NeT PGP Account

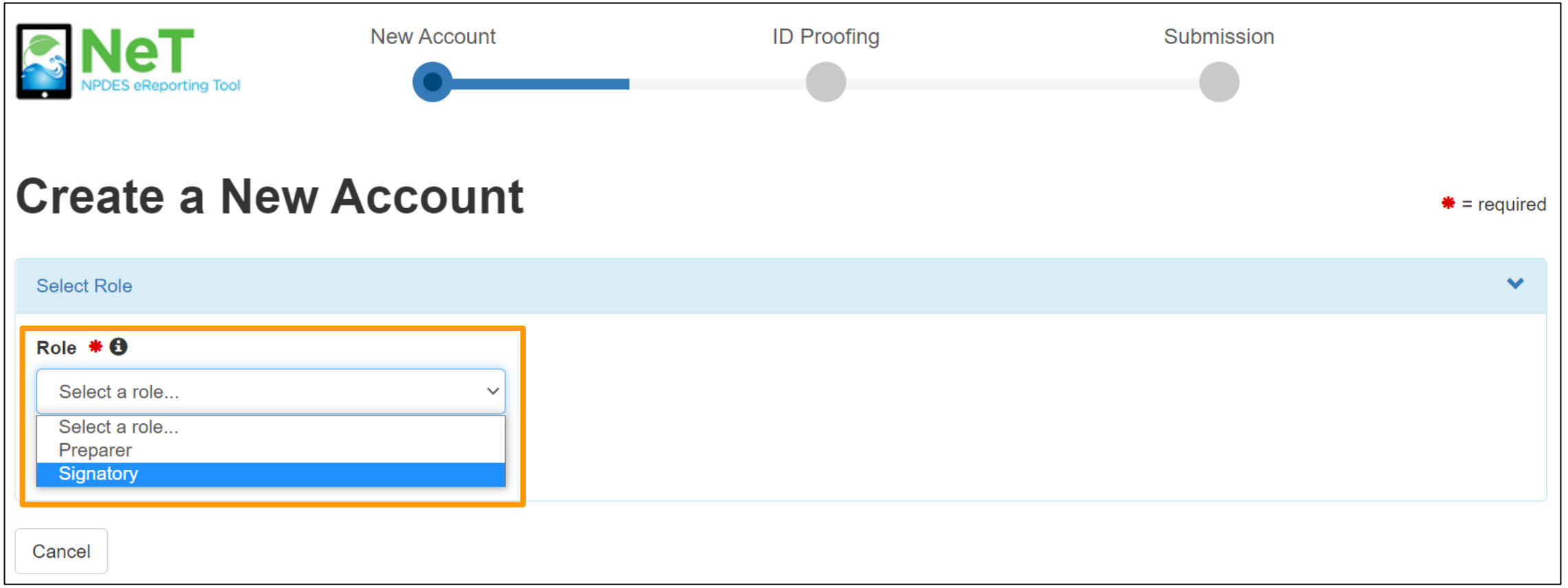
1. Navigate to NeT Login and Registration Page: https://npdes-ereporting.epa.gov/net-pgp/action/login

2. Click **Create a New Account**.

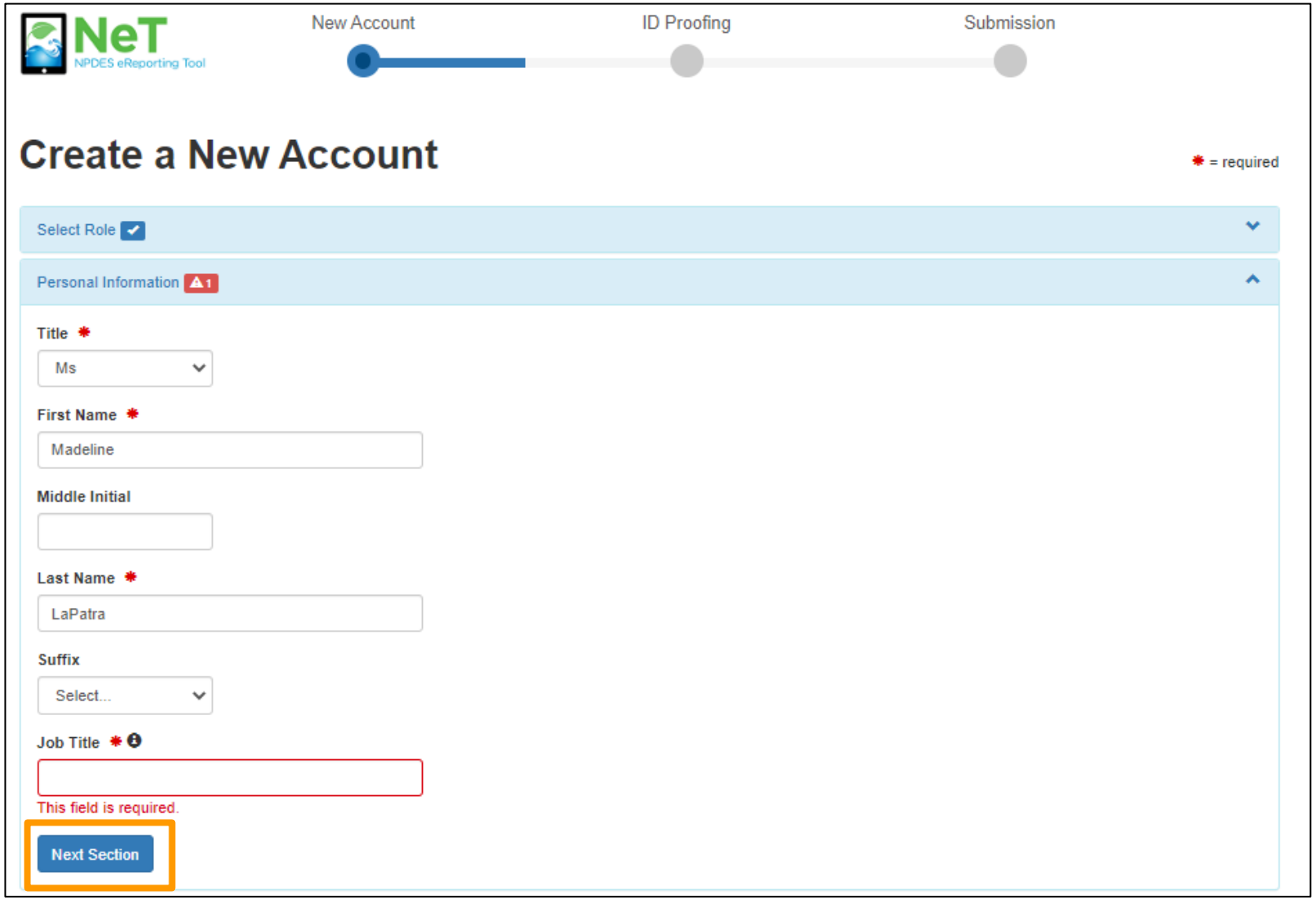
You should ‘Bookmark’ this website as it is where you will login to your account.



3. On the *Create a New Account* page, select a permittee role: Preparer or Signatory.
   - A **Preparer** is eligible to prepare documents for Decision-makers, or their designees to certify.
   - A **Signatory** will go through identify verification making them eligible to certify documents in addition to preparing documents.



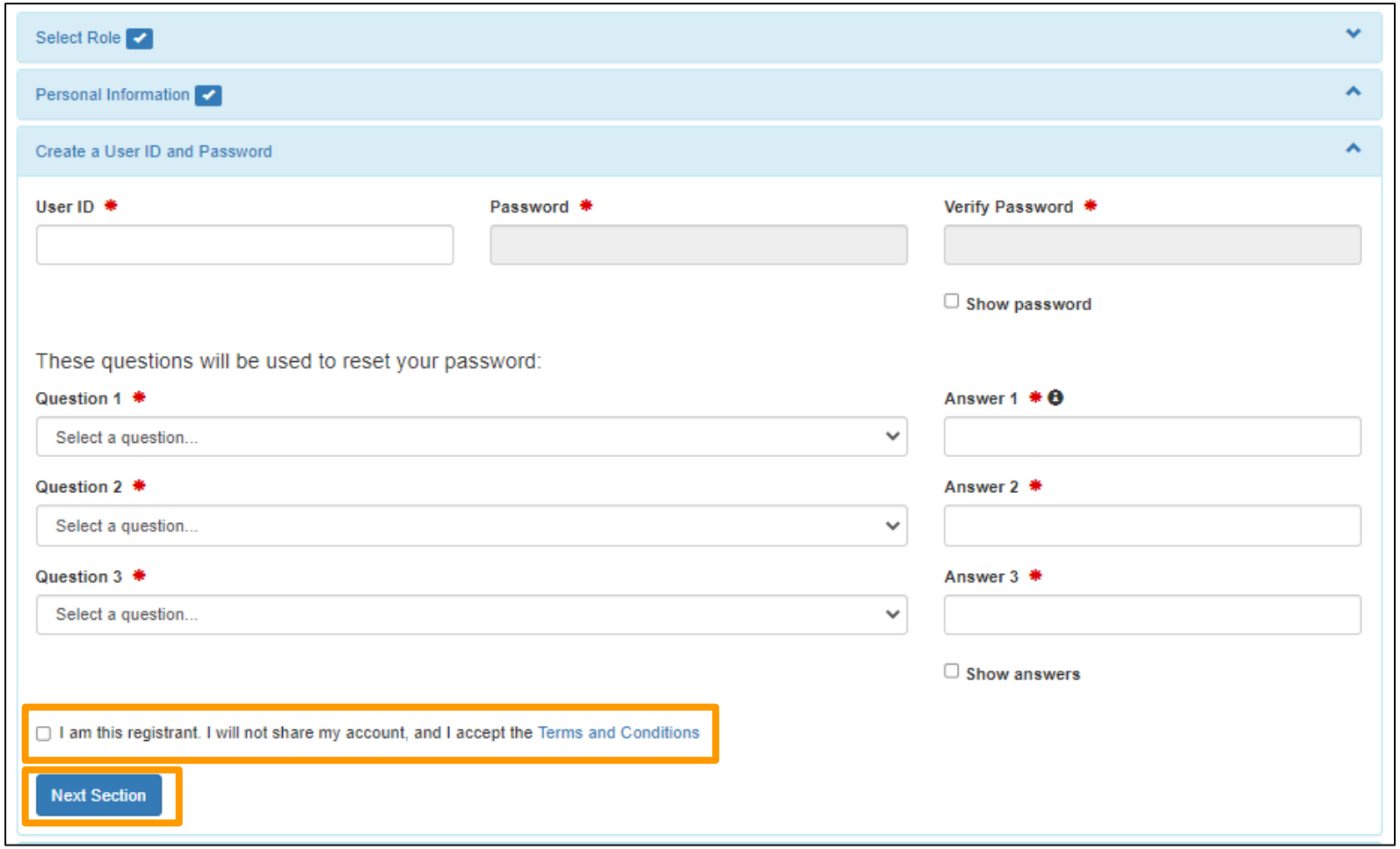
4. In Personal Information, select title and enter first name, last name, and job title. If applicable, enter middle initial and select suffix. Click **Next Section.**



5. In *Create a User ID and Password*, enter a unique **User ID** with a minimum of three characters. Enter and verify **Password** with a minimum of eight characters, containing at least one letter and one number. Check the “Show password” checkbox to reveal password.

6. Select and answer three **Security Questions.** The answers to these three questions must be unique and contain at least three characters. Check the “Show answers” checkbox to reveal answers.

7. Confirm that “I am this registrant. I will not share my account, and I accept the Terms and Conditions” by selecting the checkbox. Click **Next**.

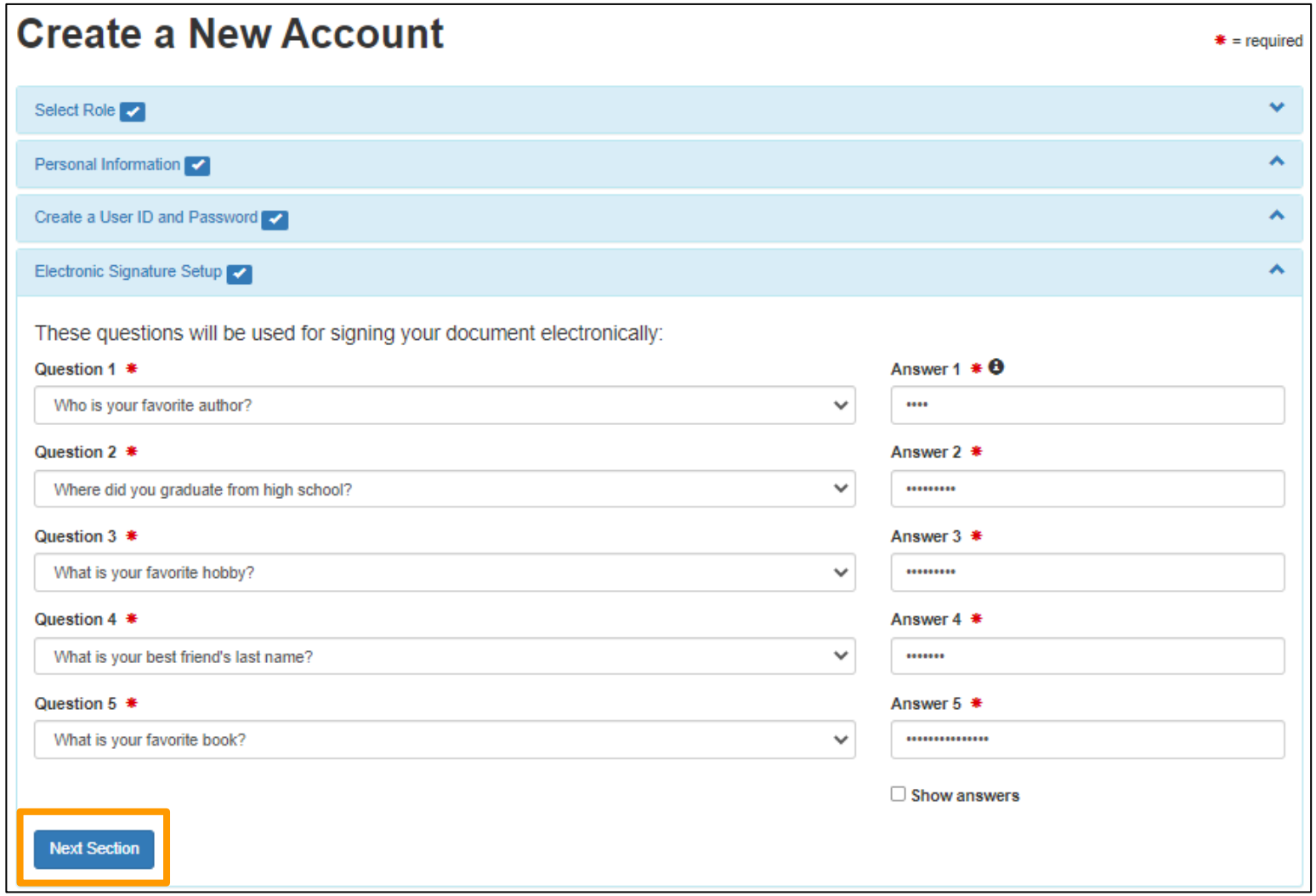


Additional Registration Step Only for Signatory Role:

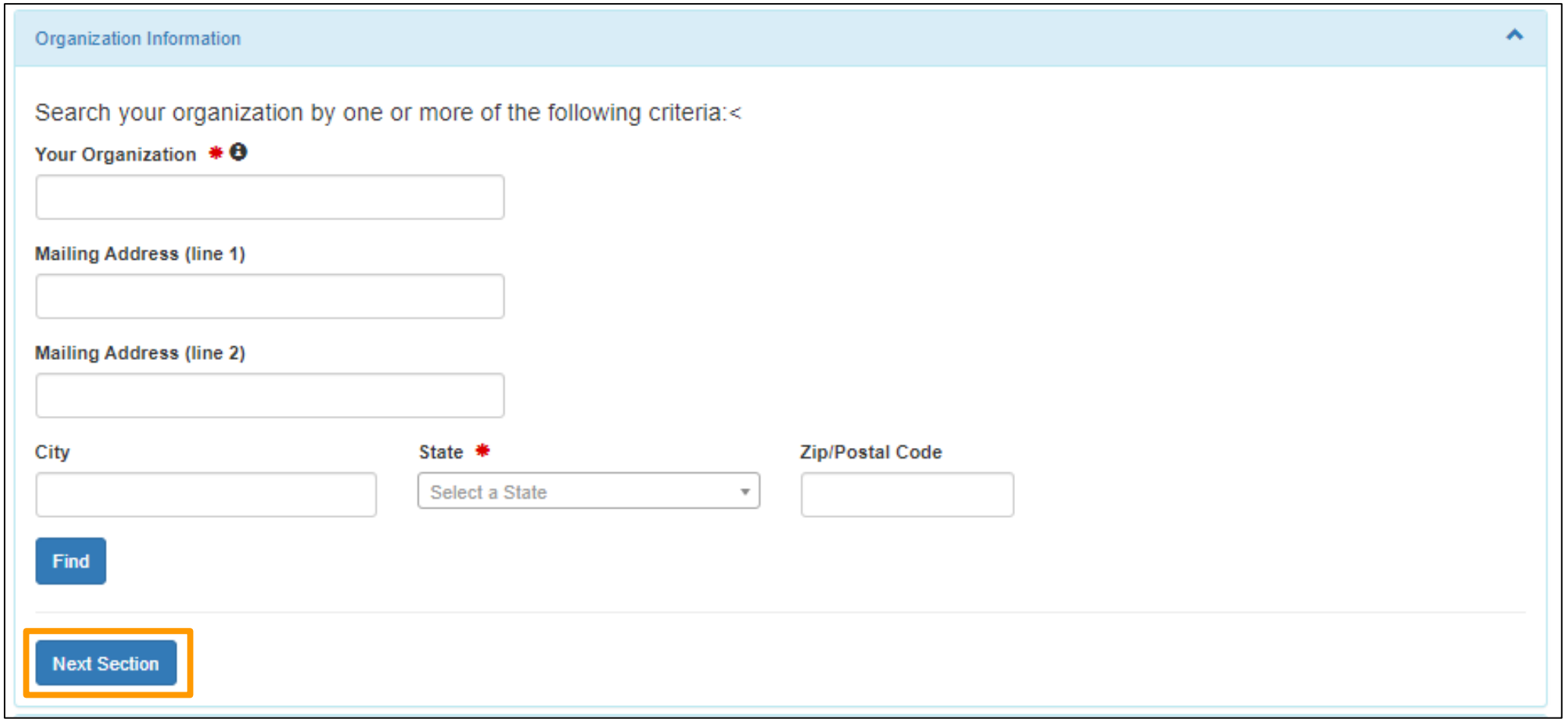
The *Electronic Signature Setup* requires users with signatory roles to select and answer questions with user inputted responses. It is important that the user has both unique and easy to remember answers for these questions.

When certifying a form as a Signatory, users will be asked to respond to one of the questions chosen below and will be required to answer to continue through the Cross-Media Electronic Reporting Rule (CROMERR) Certification Process.

Select security questions and complete answers. Click **Next** at the bottom of the page.

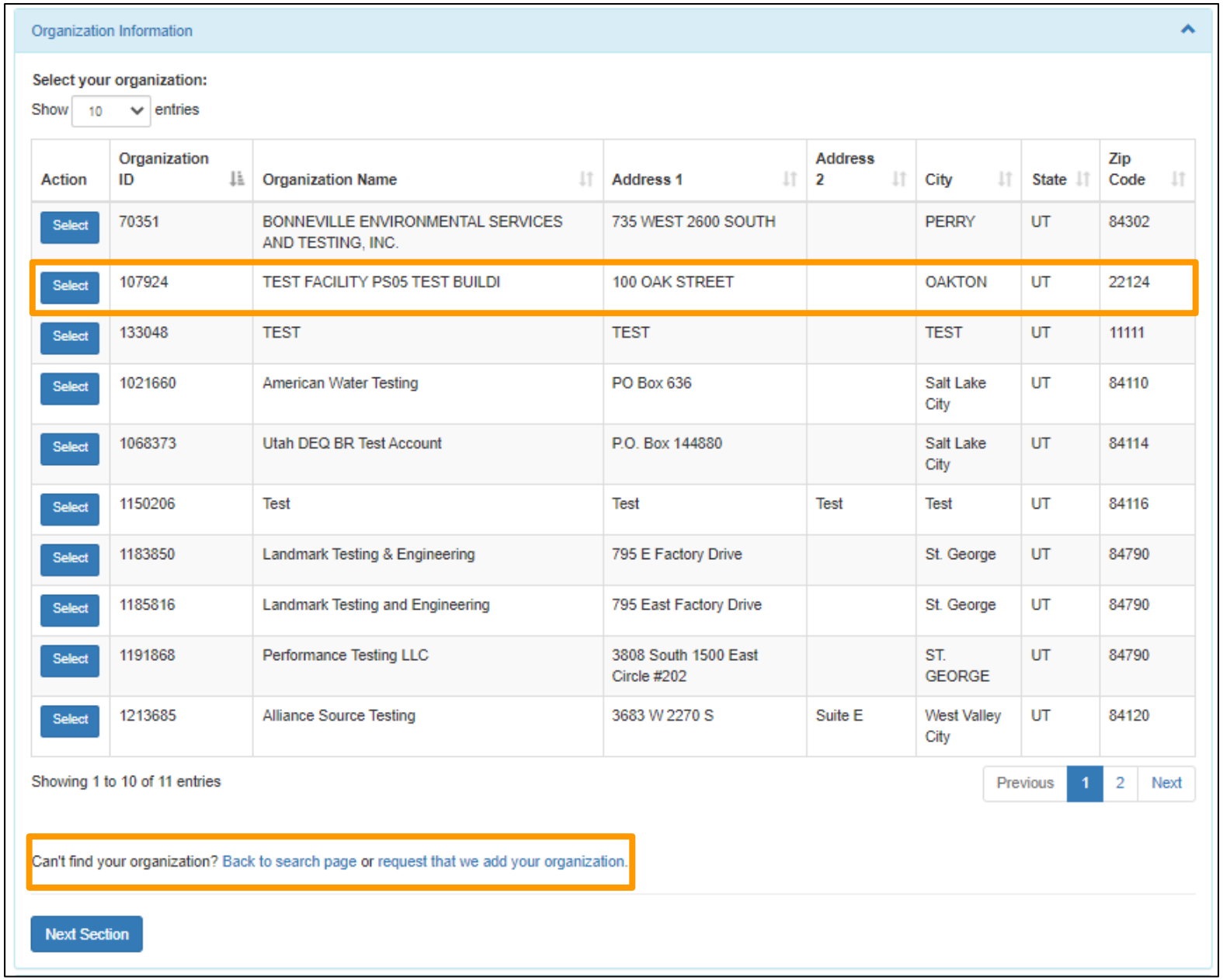


8. In the *Organizational Information* section, search for existing organization using **Name** and **State**. Mailing address, city, and zip code can be used as additional search criteria. Click **Find.**

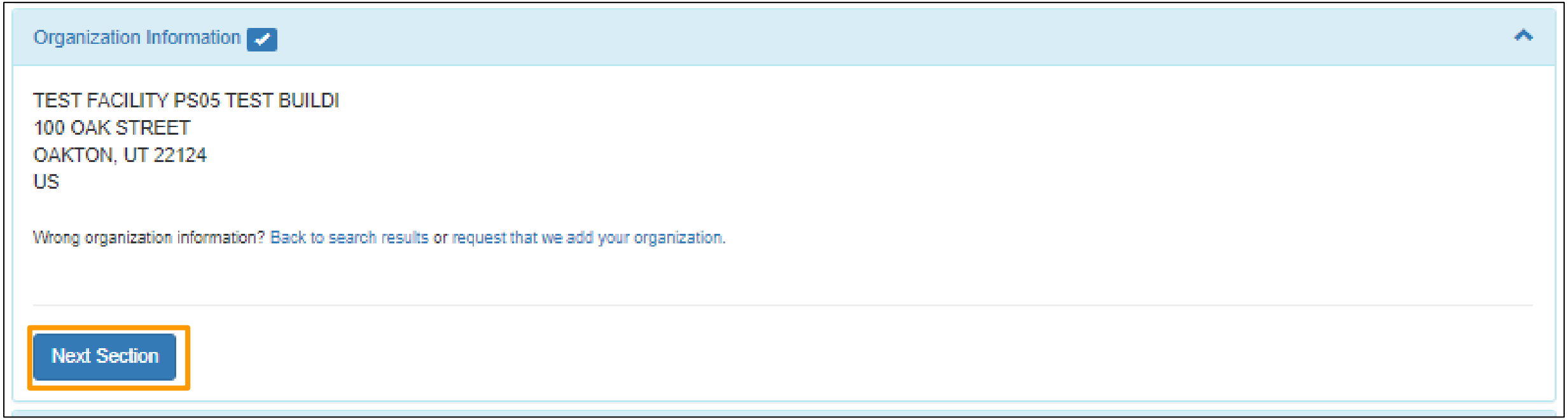


9. Review search results. Select “Back to Search Again” to narrow results or change criteria. Click **Select** next to correct organization from search results.

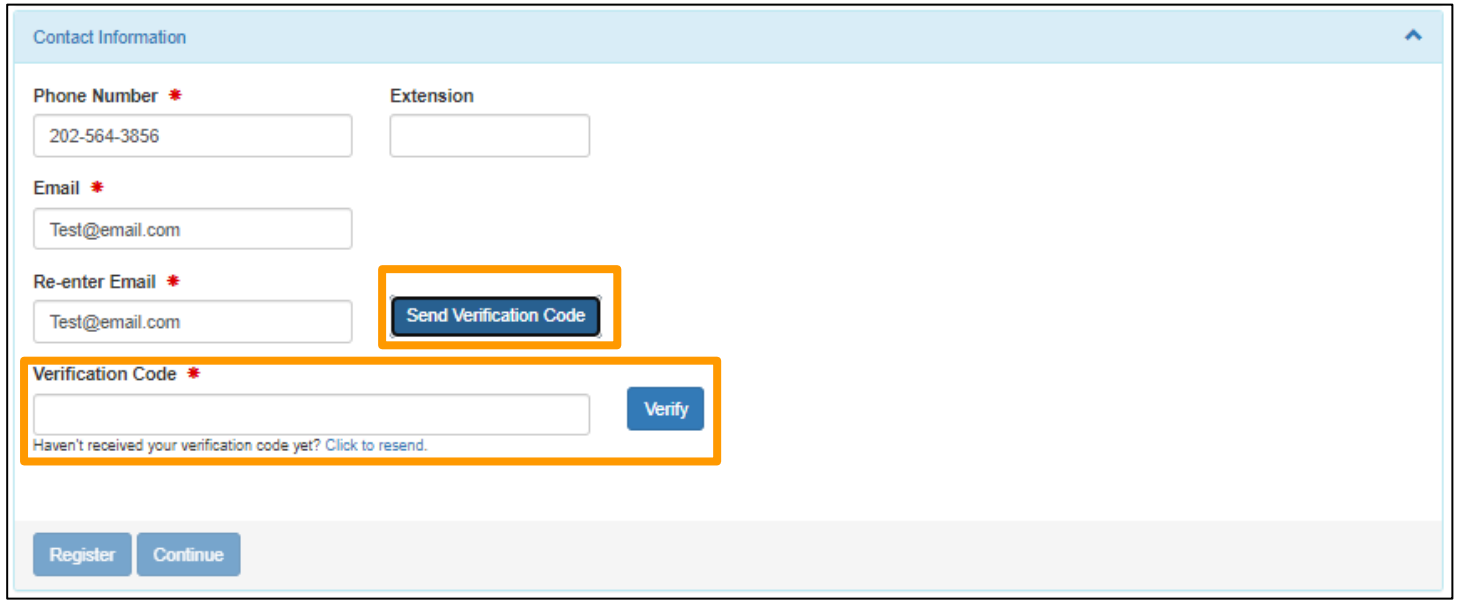
If you cannot find your organization, return ‘Back to the search page’ to refine your search or ‘request that we add your organization’.



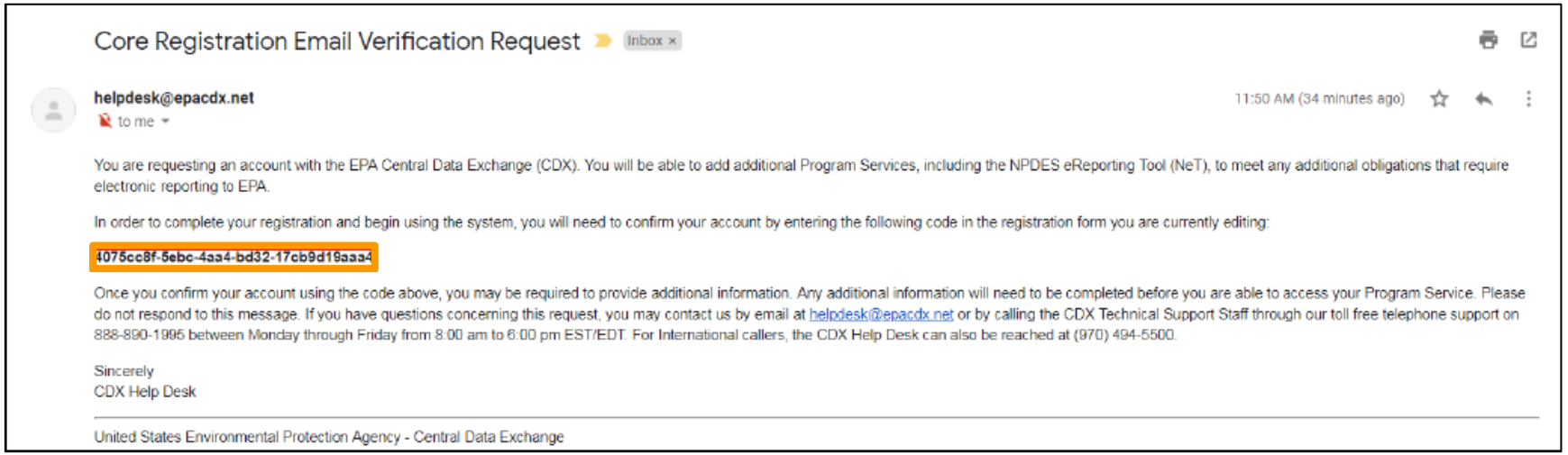
10. Information for the selected organization will be displayed in the *Organization Information* section. Confirm it is correct, then click **Next Section.**



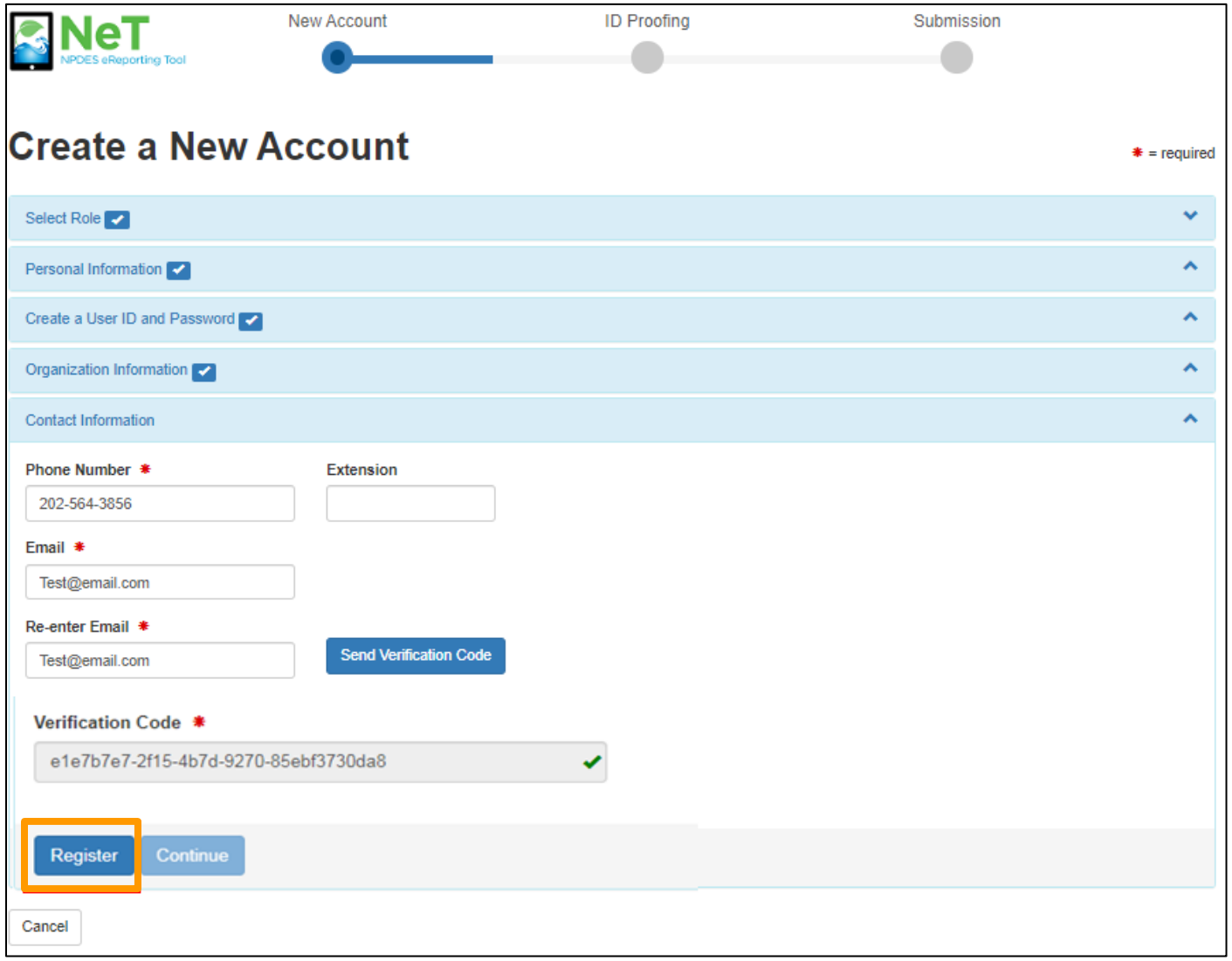
11. In the *Contact Information* section, enter phone number. Enter and confirm email. Click **Send Verification Code**. A verification email with the subject “Core Registration Email Verification Request” will be sent to the email address provided. The **Verification Code** field will be displayed.



12. Open the “Core Registration Email Verification Request” email. Copy the bolded verification code and paste into the **Verification Code** field in NeT Contact Information section.



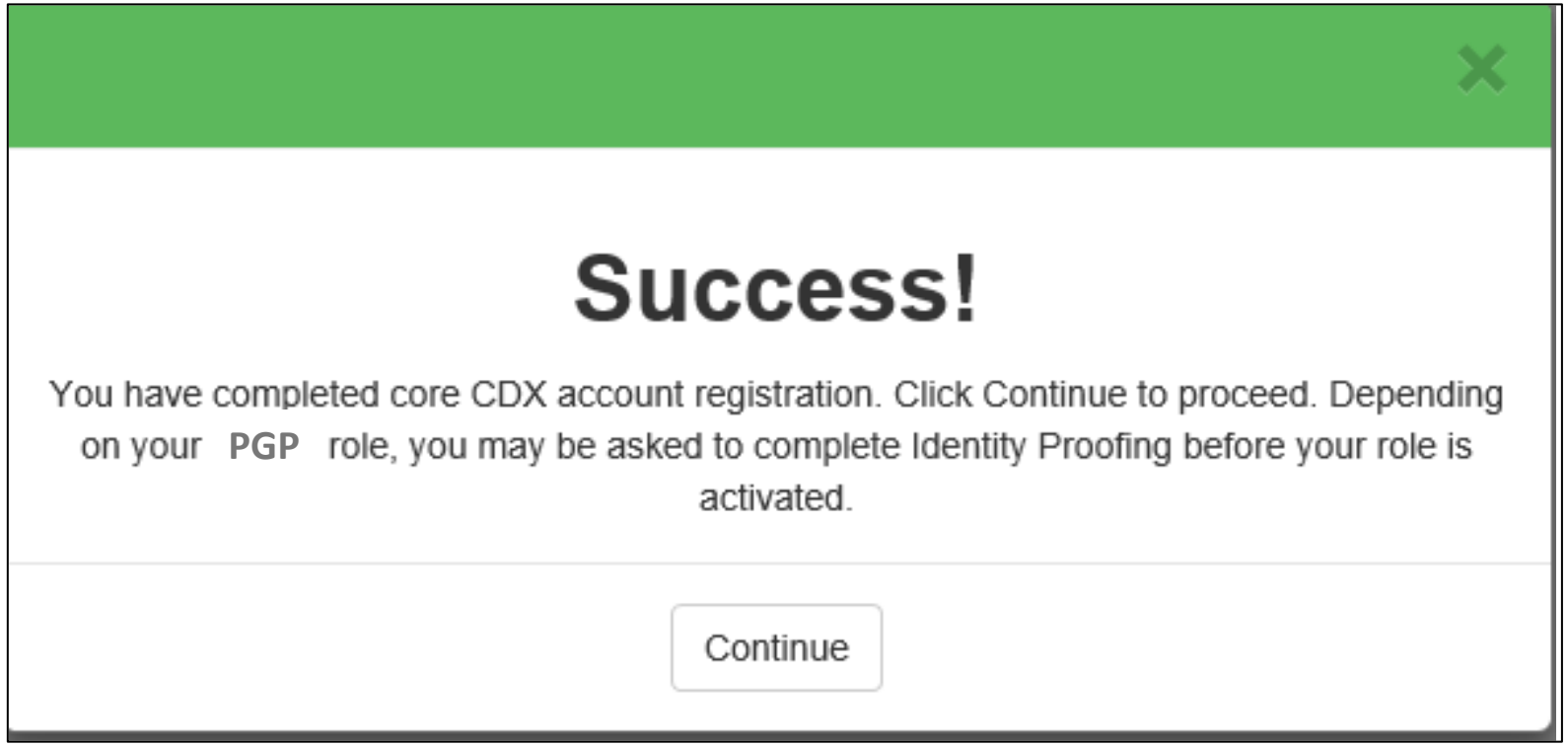
13. After the verification code is correctly entered, a green check mark will appear in the **Verification Code** field. Click **Register** to complete the registration process.



Preparers have completed registration and can now access NeT PGP.

Signatories will need to continue as additional information is required:

- Identity Proofing
- Electronic Signature Agreement (ESA)



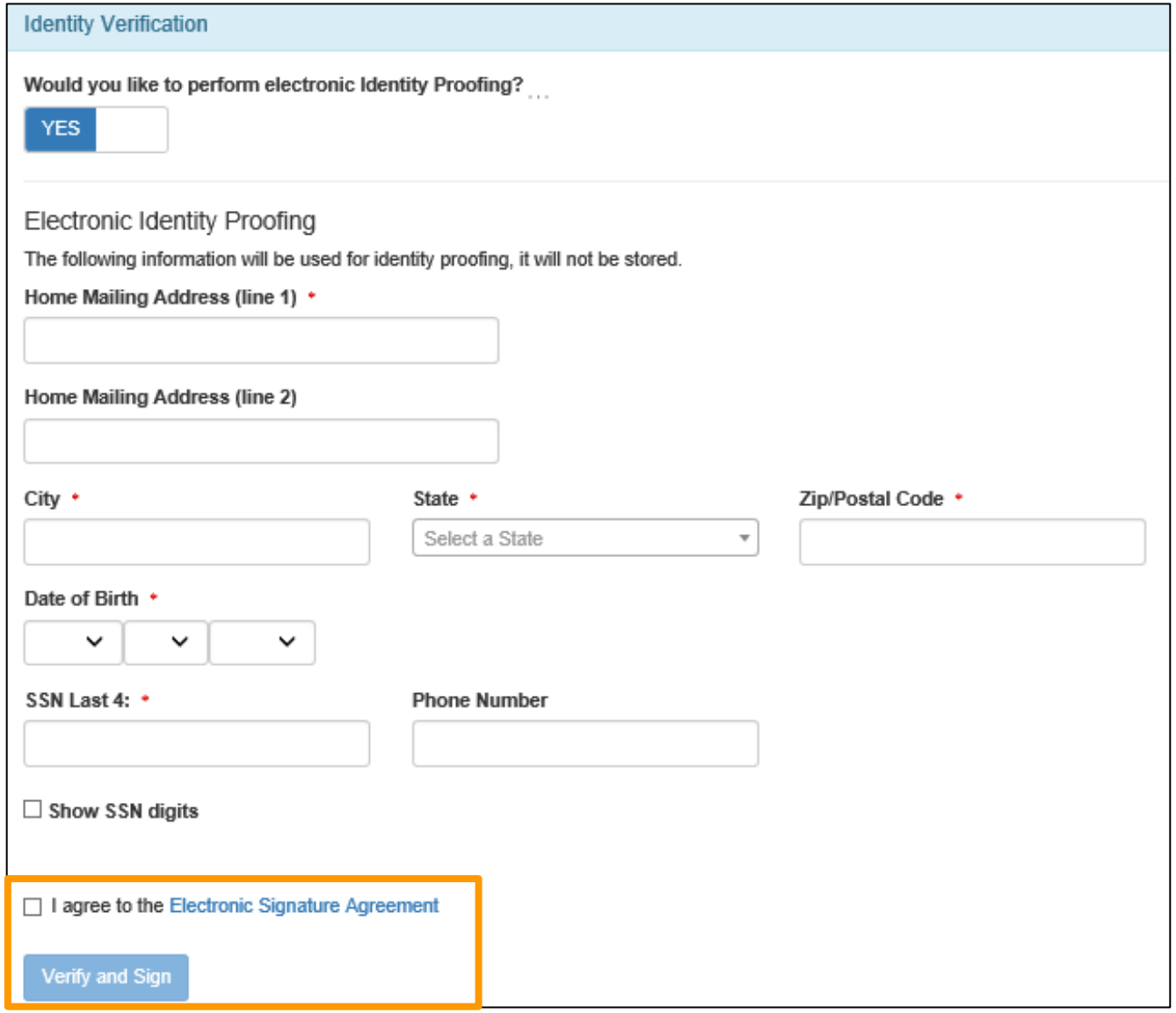
Additional Registration Step Only for Signatory Role:

In the Identity Verification section, enter Home Mailing Address, Date of Birth, and SSN Last 4. This information is used to verify identity to process electronic signatures.

- You should use your personal information (Home address) in the requested fields, not your company information.

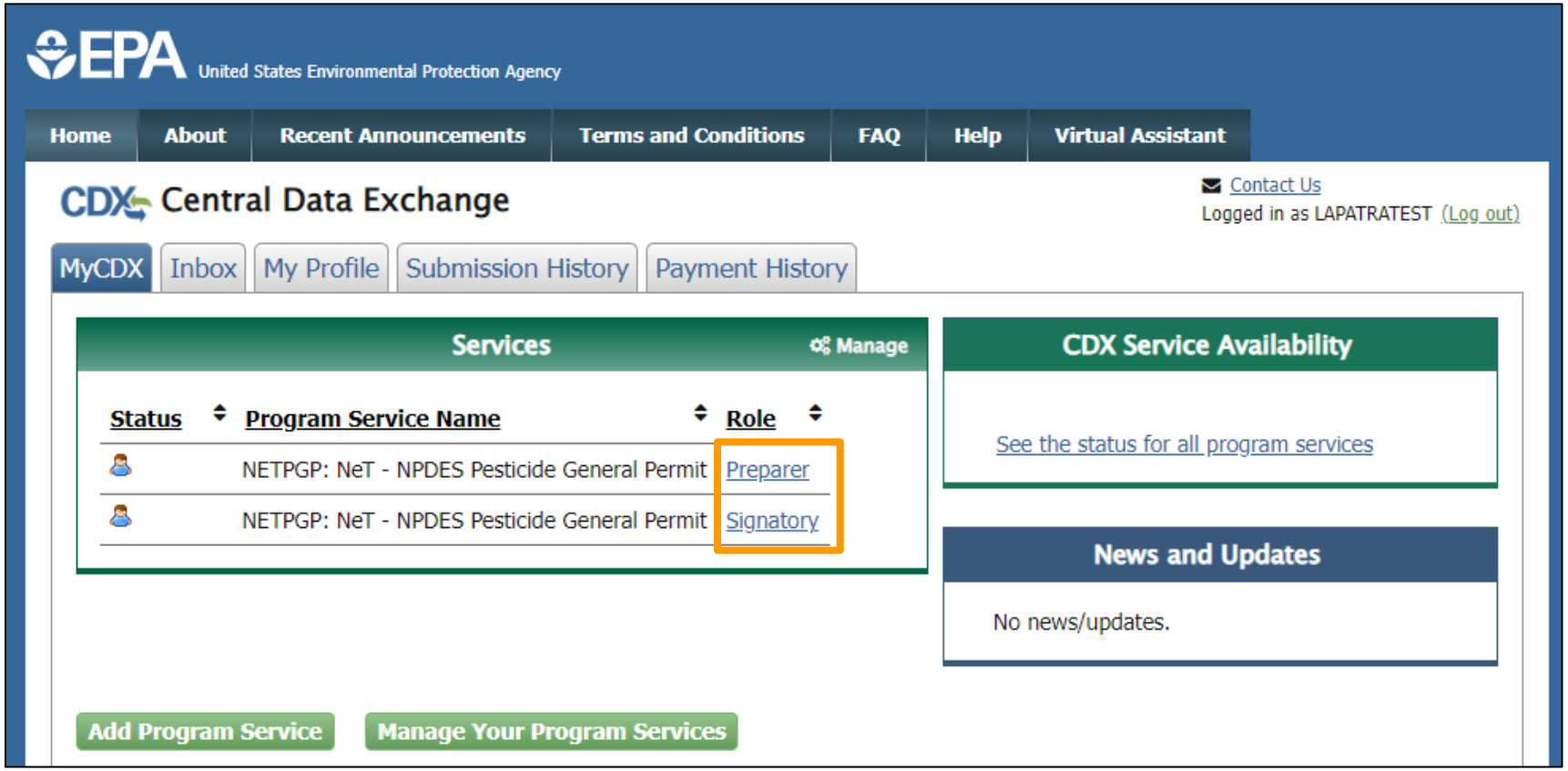
Check “I agree to the Electronic Signature Agreement” after reading the linked document. Click **Verify and Sign**.

Note: If you fail LexisNexis or if you opt to complete the paper ESA process you will have to print and mail a paper ESA.



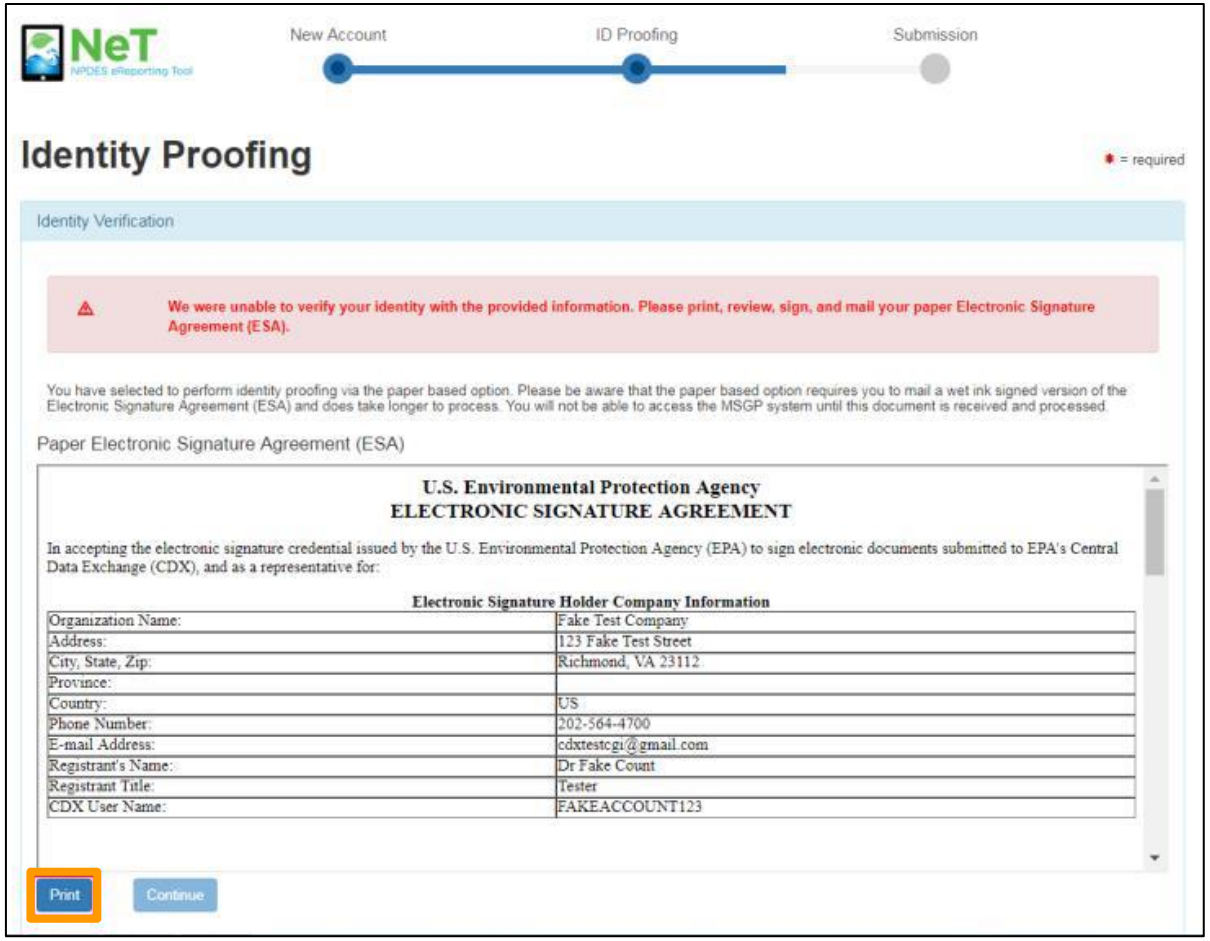
At the bottom right-hand corner of the screen, two notifications will appear.

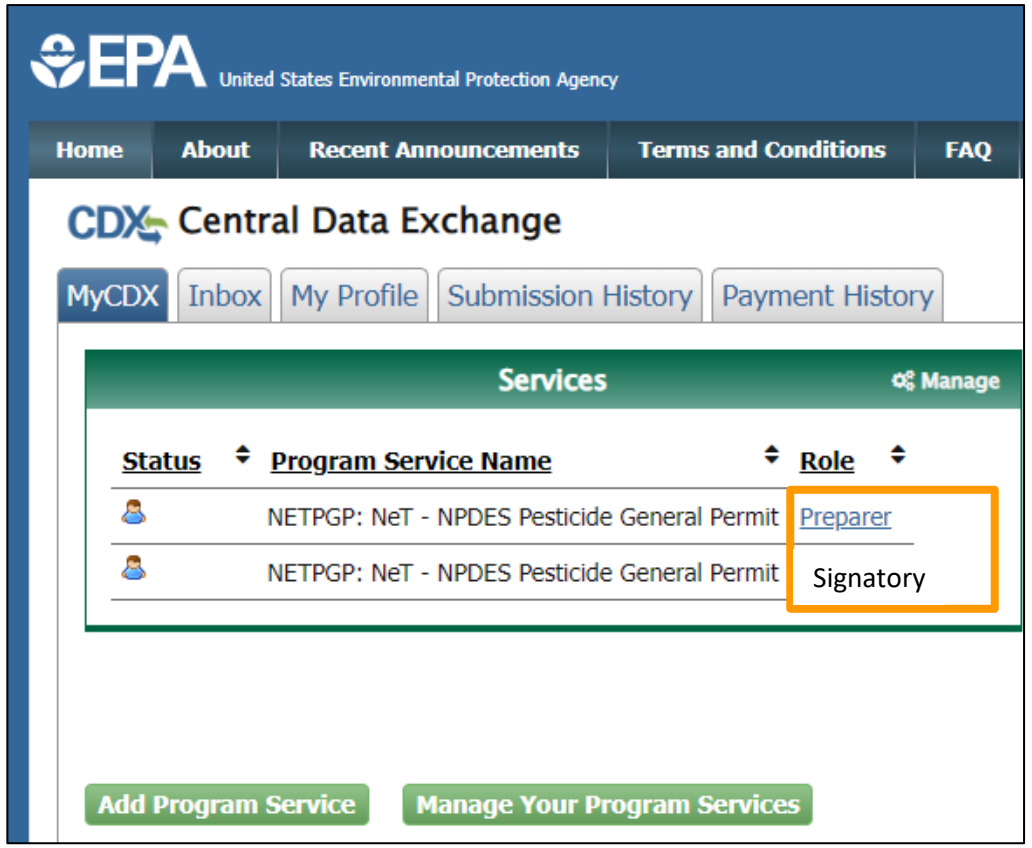
You have now successfully made a CDX Account and can access NeT PGP by clicking on your hyperlinked role.



Additional Registration Step Only for Signatory Role:

If your identity was unable to be verified (or if you opt for the paper form), it must be manually submitted. **Click Print and mail to the address listed**. NeT PGPT will be accessible once the Electronic Signature Agreement is received and processed.





CDX Account Sharing Reminder:

- All Permittee (signature) must submit an Electronic Signature Agreement (ESA) which includes Identify Proofing.
- CDX account (password and user ID) can only be registered to one person and cannot be shared or transferred.
- Misuse of credentials for a government system is a federal offense.
- User's account will be locked due to violation.
- If an individual is no longer associated with the company/facility, they must have their account deactivated.

The Electronic Signature Agreement is as follows:

The electronic submittal of information to the United States Environmental Protection Agency (EPA) requires the creation and maintenance of a CDX user account.

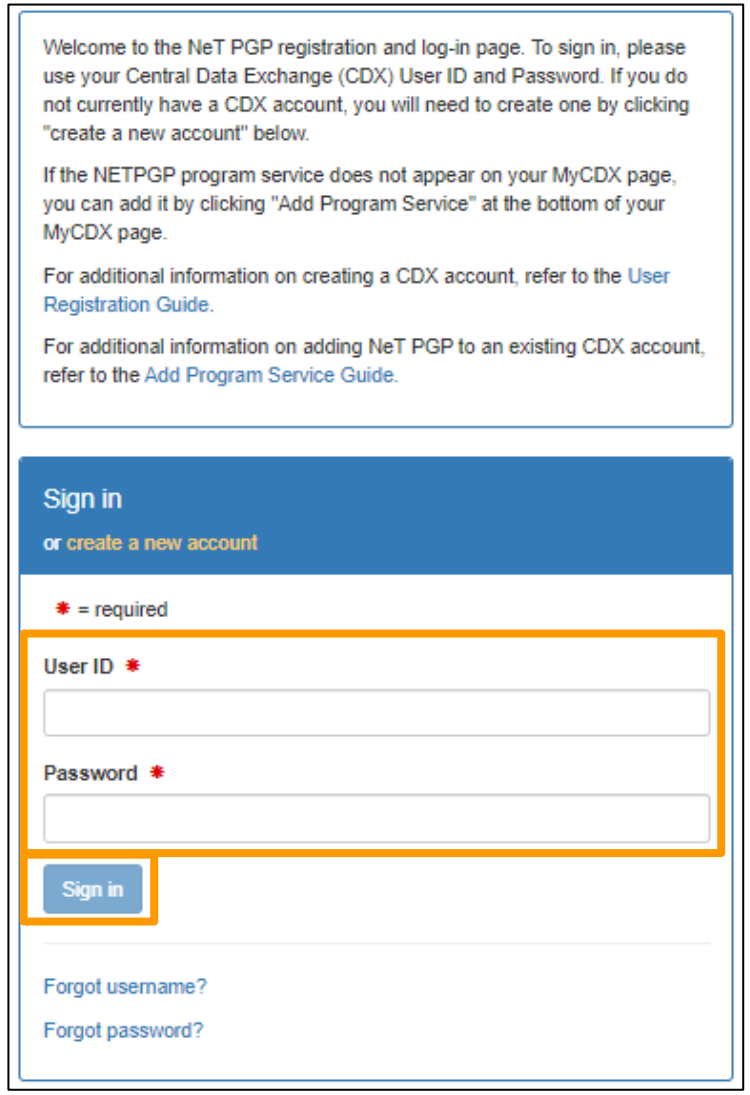
1. I have reviewed and agree to the following conditions for the access and use of my account.
2. I understand and agree that I will be held as **legally bound, obligated, or responsible** for any electronically signed submission I make as I would be by making such submission in hardcopy form with my handwritten signature;
3. I agree to maintain an email account. If any email sent to me by EPA is returned as undeliverable, I will explain why this occurred when requested by EPA;
4. I agree to protect my username and password from use by anyone except me. **I will not divulge or delegate my username or password to any other individual**. I will not store my password in an unprotected location, and I will not allow my password to be written into computer scripts to achieve automated login;
5. I agree to contact the EPA as soon as possible after suspecting or determining that my username and password have become lost, stolen, or otherwise compromised, or of any other security incidents; and
6. I agree not to attempt to view, change, or delete data unless I have the authorization to do so. I agree to behave in an ethical and trustworthy manner and to be alert to threats to applications and data.

Logging into your CDX Account to Access NeT PGP

Go to the NeT PGP Login Website:

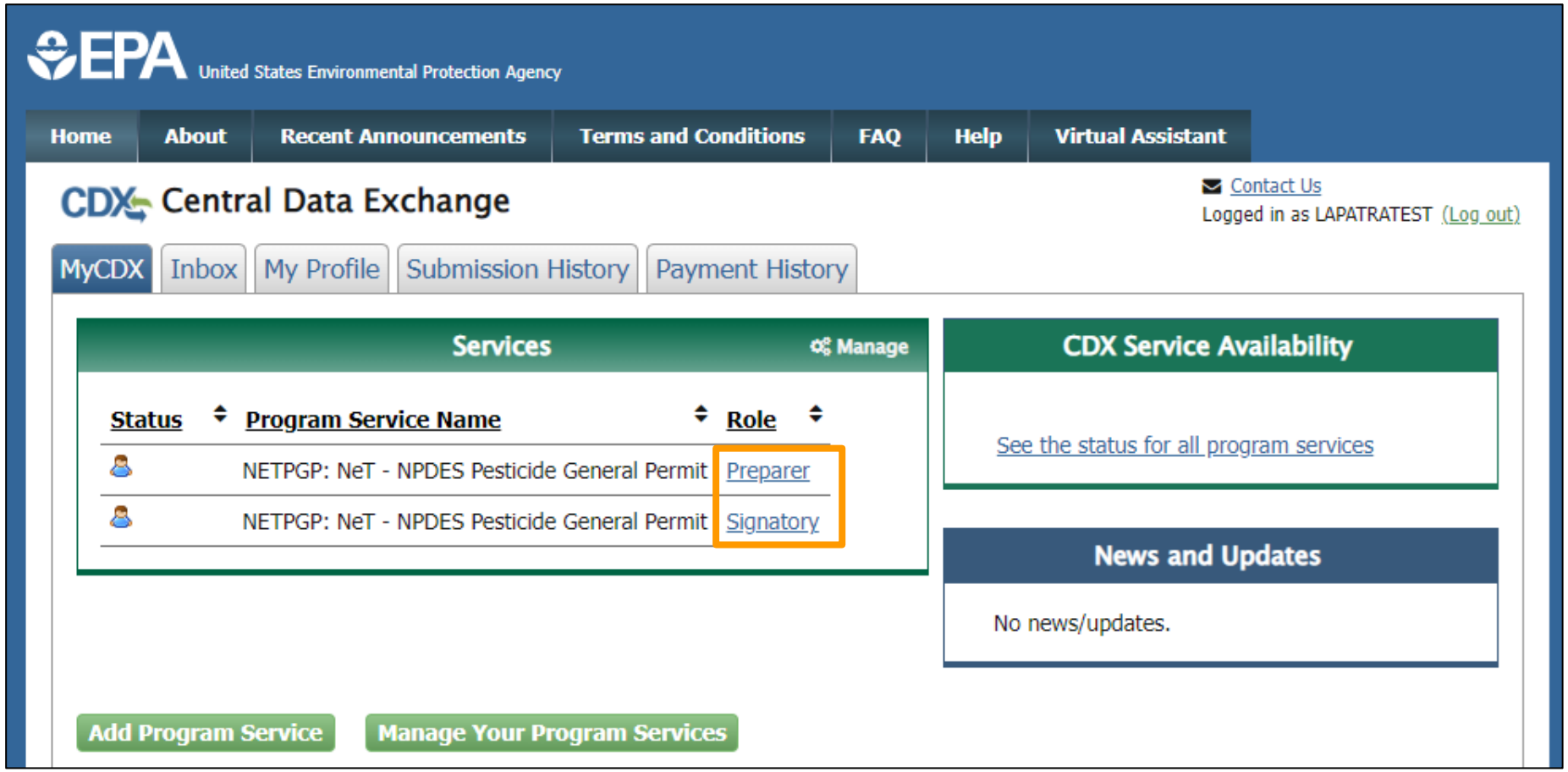
https://npdes-ereporting.epa.gov/net-pgp/action/login

Links at the bottom if you forgot your username or password.



CDX Home Page

Once you have logged in, you can enter NeT PGP by clicking on your hyperlinked **ROLE.**



NeT PGP System Features

Internet Accessible

- Can use computers, laptops, tablets, or smartphones
- Can use Internet Explorer, Firefox, or Chrome

15-minute time out

- 15 minutes of inactivity will log the user out
- Make sure to save every 15 minutes to avoid losing work

Related Questions

- For some questions, depending on the answer provided, additional questions will appear

You will be prompted to change your CDX password every 90 days.

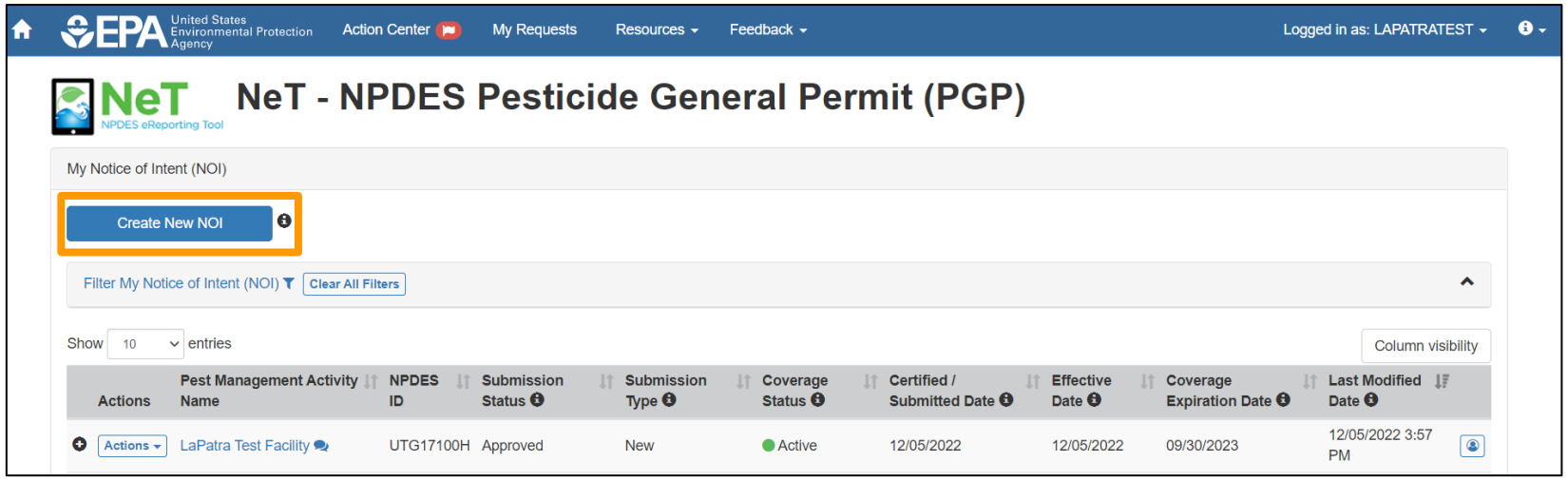
Live Demo of NeT PGP

CREATING AN NOI

FILLING OUT AN NOI

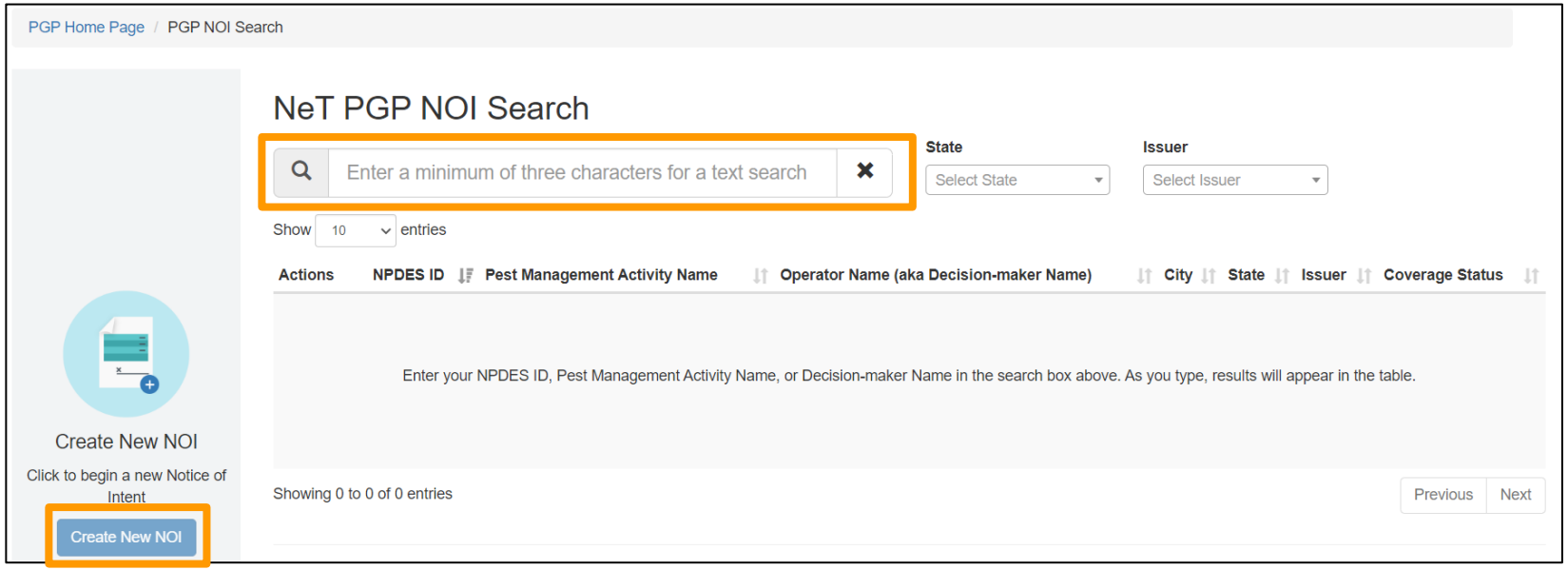
SUBMITTING & CERTIFYING AN NOI

Creating an NOI in NeT PGP



- To create a new NOI, click 'Create New NOI'

- You will have to search for your NeT PGP NOI (even if you haven't created one) to have the 'Create New NOI' button become available.



Pesticide Discharge Management Plan (PDMP) Requirements

MUST BE SUBMITTED WITH NOI IN NET

PDMP Development and Implementation Requirements

Operators must:

- Develop and Implement a PDMP.
- Update their PDMP as needed.
- Review their PDMP at least once a year for update.
- Upload their PDMP to NeT PGP or provide a web address of the plan at the time their NOI is entered into NeT.
- Immediately implement their plan upon NOI submission.
- Make their plans available to DWQ upon request.

PDMP Content

- There is not a specific PDMP template that must be used.
- Thus far, most NOIs in NeT PGP have been denied for approval due to missing or insufficient content.
- Content must be current and specific to current treatments, treatment areas, practices, planning, application and surveillance equipment used, etc.
- Determine any Category 1 Waters and ask DWQ for approval to treat.
  - Include any instructions from DWQ in the Plan.

PDMP Required Content

PDMP Components:

1. PDMP Team
2. Pest Management Area Description and Summary
3. Control Measure Description
4. Schedules and Procedures
5. Certification and Signature

PDMP Required Content, cont.

1. PDMP Team and Contact Information for:
    a. Person(s) responsible for managing pests in the pest management area.
    b. Person(s) responsible for developing and revising the PDMP.
    c. Person(s) responsible for developing and implementing corrective actions.
    d. Person(s) responsible for pesticide application decisions and treatments.

PDMP Required Content, cont.

2. Pesticide Management Area Description:
   a. Pest Problem Description. Describe pest problem and target pests, source of problems, and data used to identify the problem.
   b. Action Thresholds. Describe action thresholds and how they were determined.
   c. Location Map. Include waters of the State and treatment areas.
   d. Water Quality Standards. Document standards for waters and any pesticide listed waters. Determine any pesticides with standard parameters or that may affect standard parameters (ammonia, DO, copper, etc.)

PDMP Required Content, cont.

3. Control Measure Description. Measures to comply with technology-based effluent limitations:
   a. Use lowest effective amount of product.
   b. Regular maintenance of equipment to prevent spills.
   c. Maintain treatment and application equipment, calibrate, clean, repair, etc.
   d. Comply with Narrative and Numeric Water Quality Standards.
   e. Follow FIFRA labels and application rates.
   f. Protect any threatened and endangered species and habitat.
   g. Follow any operator-specific guidance provided by the Director.

PDMP Required Content, cont.

4. Schedules and Procedures:
    a. How lowest effective application rates are determined.
    b. Spill/discharge prevention plans, measures, and schedules.
    c. Schedules and procedure for equipment maintenance.
    d. Procedures and equipment for pest surveillance.
    e. Procedures and methods for assessing environmental conditions prior to treatments.

PDMP Required Content, cont.

f. Spills Response Procedures.
   i. Procedures for stopping, containing, cleaning up.
   ii. Employee training.
   iii. Response equipment.
   iv. Procedures for notification of incidents internally, emergency response and regulatory agencies.

g. Pesticide Monitoring Schedules and Procedures.
   i. Process for determining any monitoring locations.
   ii. Monitoring schedule.
   iii. Person(s) who conduct monitoring.
   iv. Documenting impacts to non-target organisms.

PDMP Required Content, cont.

5. Certification and Signature Requirements.
    a. Operators must sign certification statement.

Payment Instructions

UTAH'S CHASE PAYMENT PORTAL

Permit Fee Payment Reminders and Deadlines

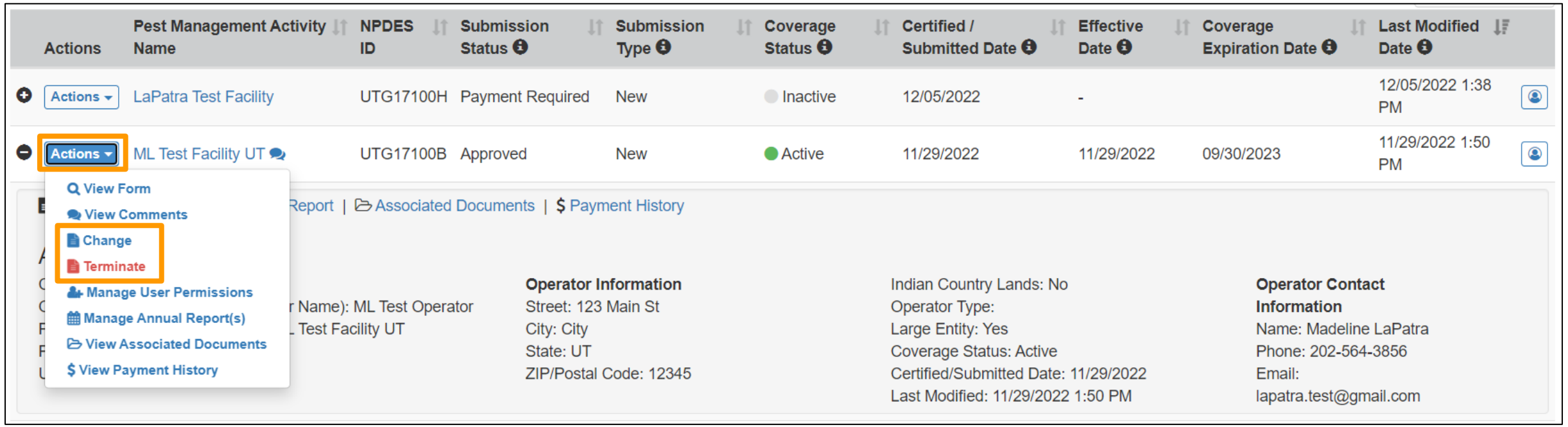
- Annual permit fee payments are recorded in NeT PGP by DWQ.
  - Permittees will not be able to record their own fee payments in NeT until August 1, 2023.
  - Please do not make any payments, (unless you are a brand-new operator seeking permit coverage).
  - DWQ has received fees for FY23 from all known operators.
- The next annual fee will be due **September 1, 2023**, which covers the upcoming Fiscal Year 2024 (July 1-June 30).
  - Invoices for Fiscal Year 2024 permit fees will be sent August 1, 2023.

Payment Reminders and Deadlines, cont.

- At this time, NeT asks for a prorated permit fee. Do not pay a prorated fee unless you are a new operator and have contacted DWQ.
- Payments for FY 2024 should be made through the Chase Bank payment portal.
- Please contact Don Hall or Susan Woeppel for permit fee questions.

Change NOIs and NOTs

Creating a Change NOI or NOT



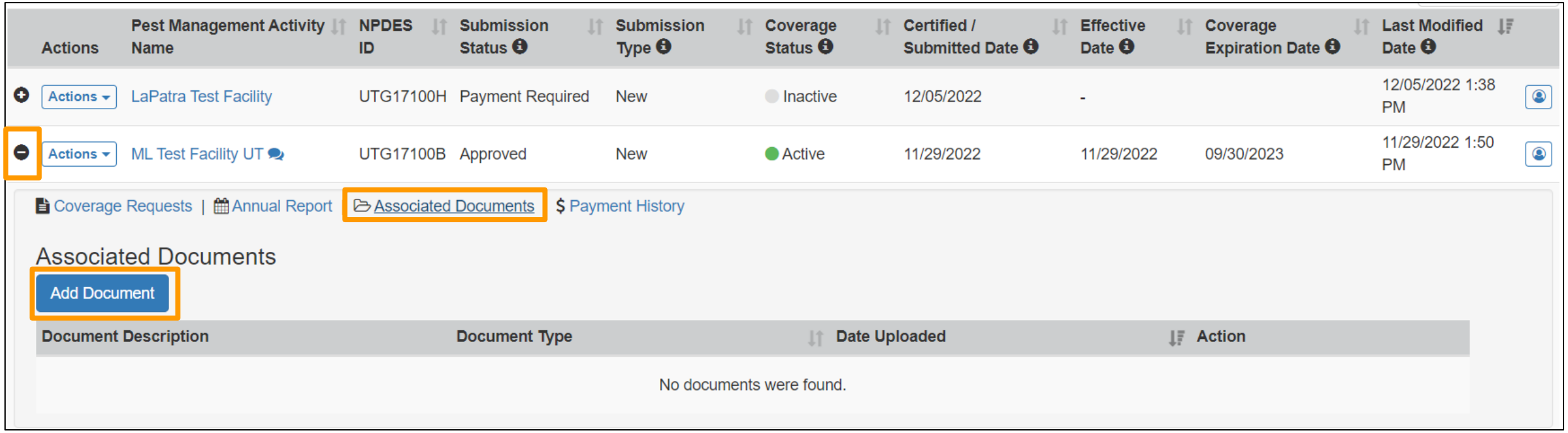
Incident Report Information

Incident Report Details

Incident reports are due in NeT within 5 days of the incident as defined in the permit.

- The report is in NeT.

Adding an Incident Report



Annual Report Information

Annual Report Details

The annual report for calendar year 2022 (1/1/2022 – 12/31/2022) is due in NeTPGP **by February 28, 2023**.

The following operators are required to submit an annual report:

- Operators that are large size applicators.
- Operators that have incidents that require incident reports.
- Operators that apply to Utah Lake.

For the 2022 reporting year, the method of your electronic Annual Report submission will depend on your Permit Effective date in NeT PGP.

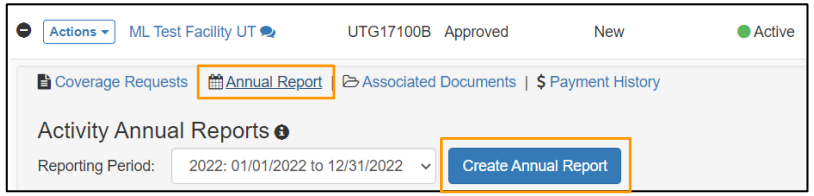
Submitting Annual Reports (for Calendar Year 2022)

I need to submit an Annual Report for Calendar Year 2022.

Did you submit your NOI electronically in NeT yet?

Yes, I submitted my NOI electronically in NeT and it was approved/ Permit Effective Date before 1/1/2023.

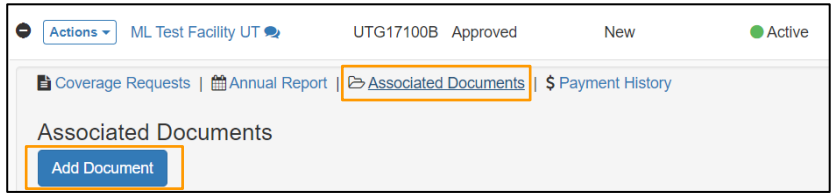
Submit your Annual Report on the 'Annual Report' tab in NeT. Your NOI must be approved and Active before 1/1/2023 for this option to show up.



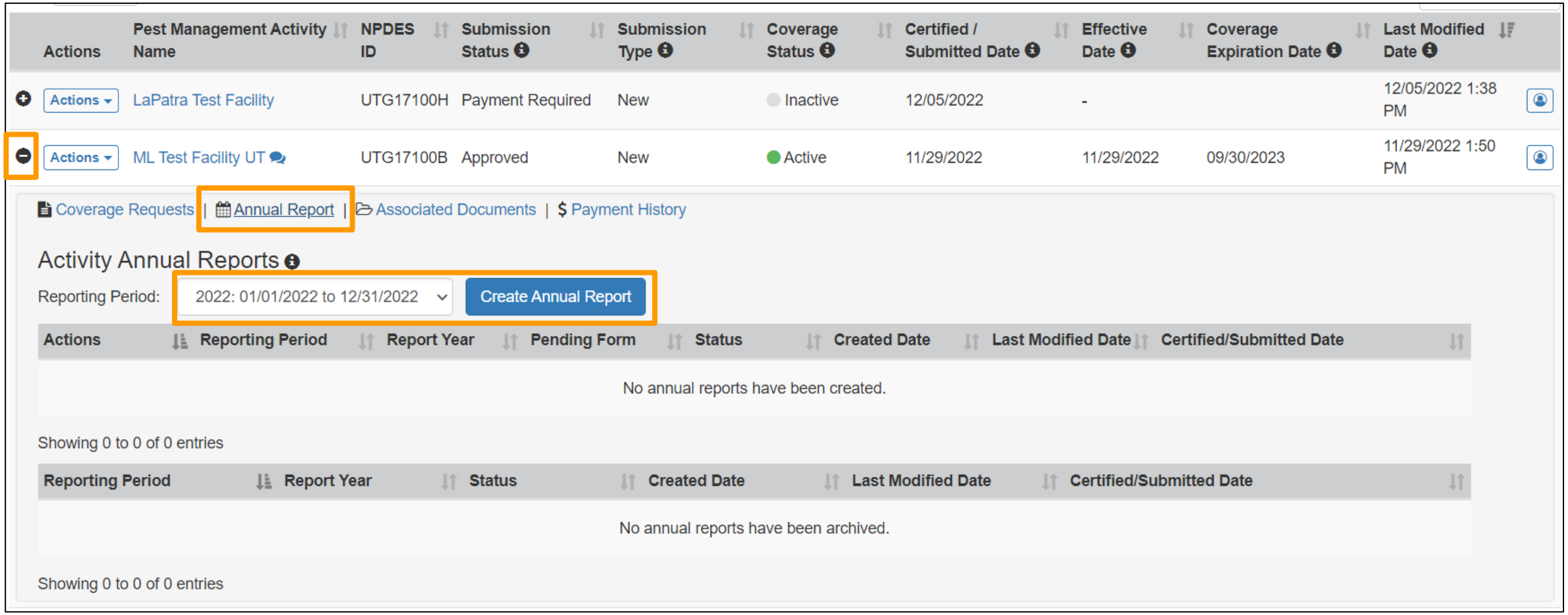
Yes, I submitted my NOI electronically in NeT after 1/1/2023 or Permit Effective Date in 2023.

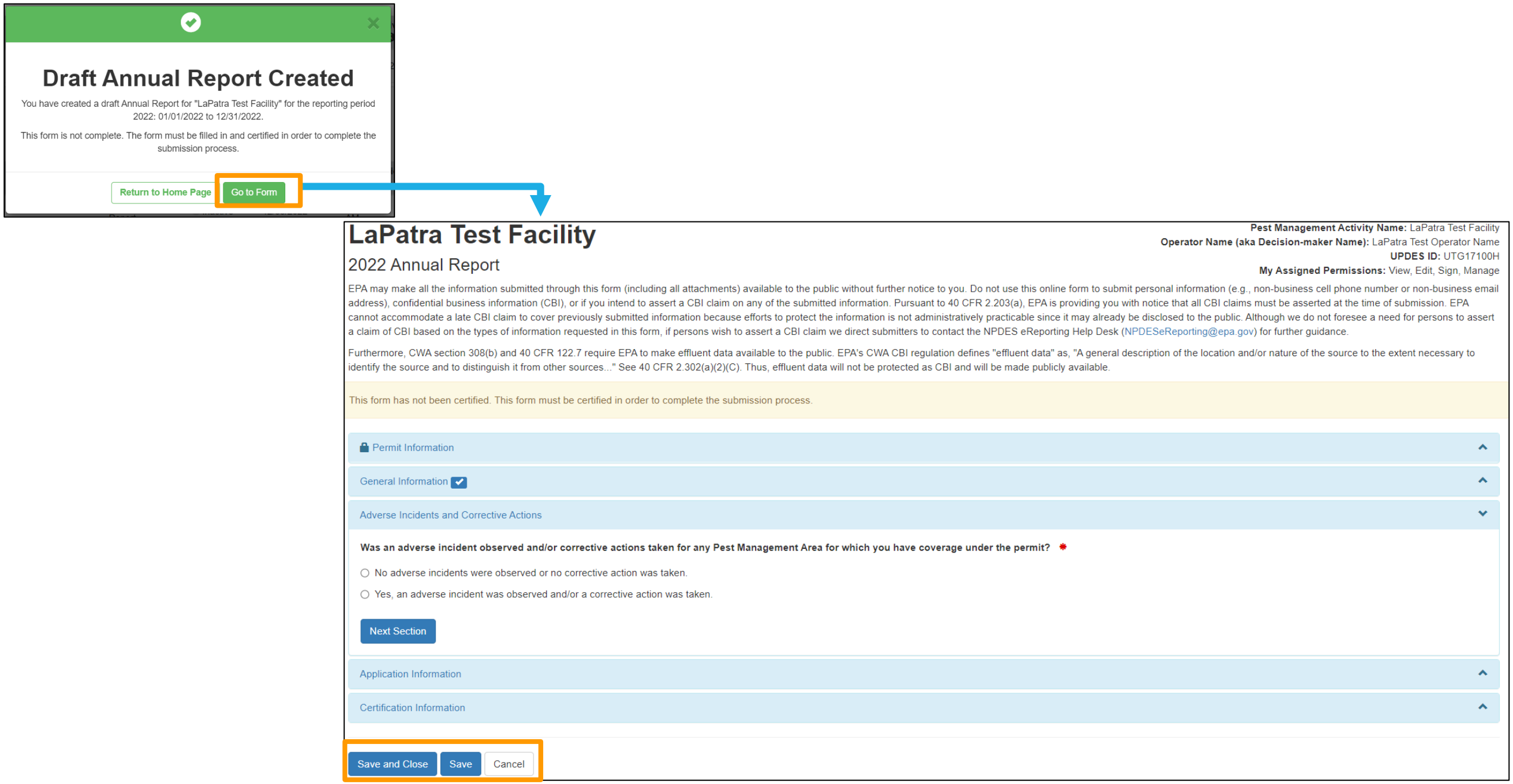
No, I have not submitted my NOI electronically in NeT yet, but I will ASAP.

Submit your Annual Report on the 'Associated Documents' tab in NeT.



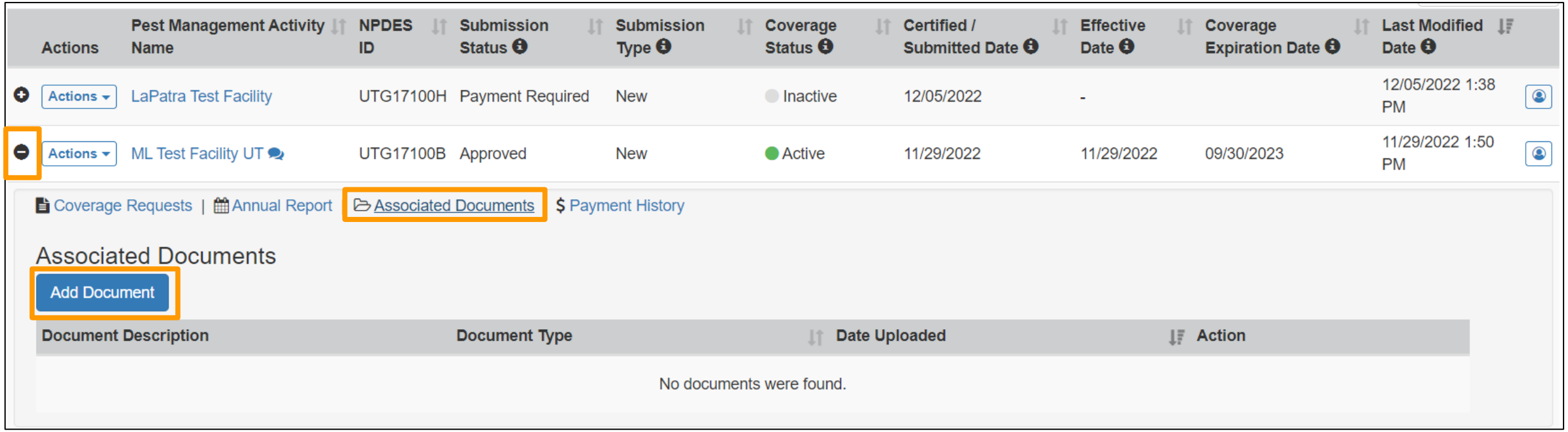
Creating an Annual Report – in 'Annual Reports Tab



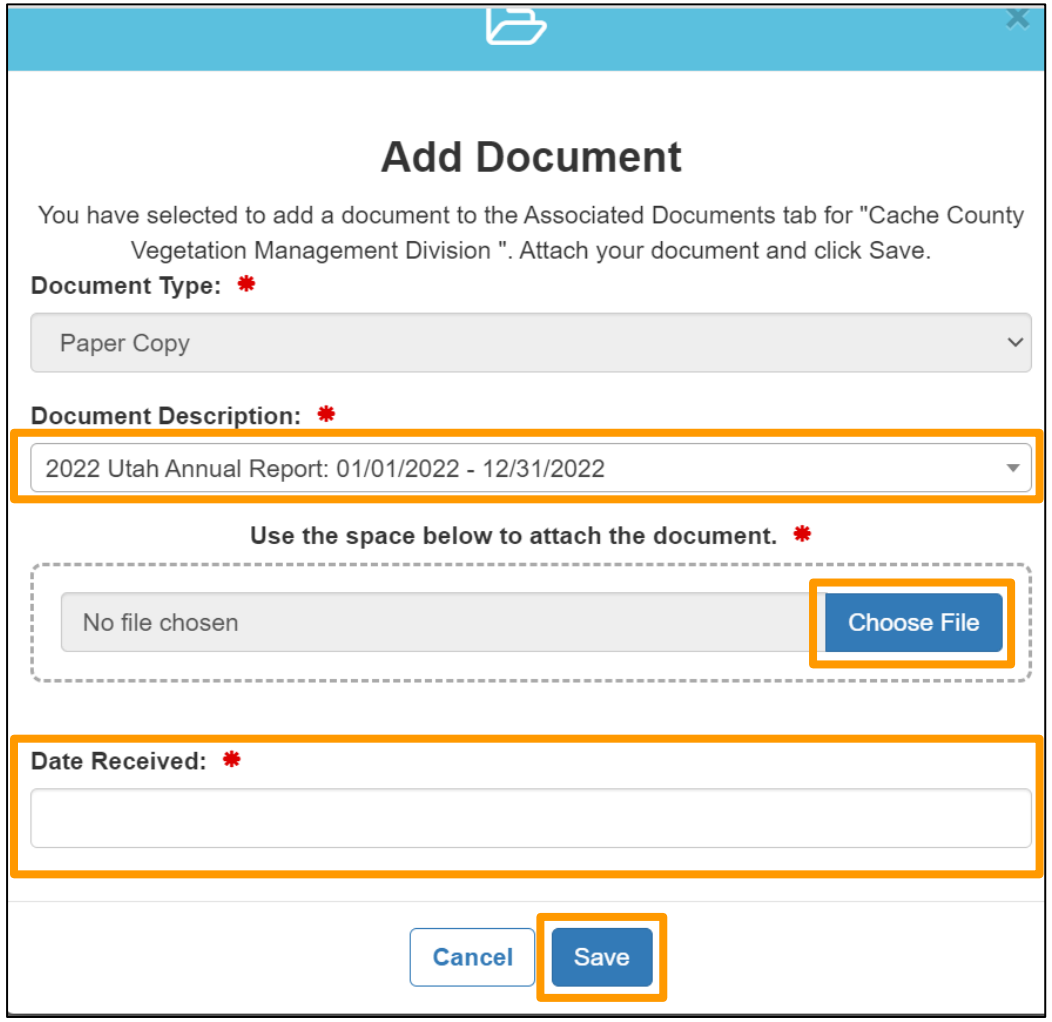

Draft Annual Report Created
You have created a draft Annual Report for "LaPatra Test Facility" for the reporting period 2022: 01/01/2022 to 12/31/2022.
This form is not complete. The form must be filled in and certified in order to complete the submission process.
Return to Home Page
Go to Form
LaPatra Test Facility
2022 Annual Report
Pest Management Activity Name: LaPatra Test Facility
Operator Name (aka Decision-maker Name): LaPatra Test Operator Name
UPDES ID: UTG17100H
My Assigned Permissions: View, Edit, Sign, Manage
EPA may make all the information submitted through this form (including all attachments) available to the public without further notice to you. Do not use this online form to submit personal information (e.g., non-business cell phone number or non-business email address), confidential business information (CBI), or if you intend to assert a CBI claim on any of the submitted information. Pursuant to 40 CFR 2.203(a), EPA is providing you with notice that all CBI claims must be asserted at the time of submission. EPA cannot accommodate a late CBI claim to cover previously submitted information because efforts to protect the information is not administratively practicable since it may already be disclosed to the public. Although we do not foresee a need for persons to assert a claim of CBI based on the types of information requested in this form, if persons wish to assert a CBI claim we direct submitters to contact the NPDES eReporting Help Desk (NPDESeReporting@epa.gov) for further guidance.
Furthermore, CWA section 308(b) and 40 CFR 122.7 require EPA to make effluent data available to the public. EPA's CWA CBI regulation defines "effluent data" as, "A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources..." See 40 CFR 2.302(a)(2)(C). Thus, effluent data will not be protected as CBI and will be made publicly available.
This form has not been certified. This form must be certified in order to complete the submission process.
Permit Information
General Information
Adverse Incidents and Corrective Actions
Was an adverse incident observed and/or corrective actions taken for any Pest Management Area for which you have coverage under the permit? *
No adverse incidents were observed or no corrective action was taken.
Yes, an adverse incident was observed and/or a corrective action was taken.
Next Section
Application Information
Certification Information
Save and Close
Save
Cancel

Creating an Annual Report – in 'Associated Documents' Only for Reporting Year 2022

You can access the Annual Report here (to upload to Associated Documents): https://documents.deq.utah.gov/water-quality/facilities/general-permits-pesticide/DWQ-2022-027764.pdf



You can access the Annual Report here (to upload to Associated Documents):
https://documents.deq.utah.gov/water-quality/facilities/general-permits-pesticide/DWQ-2022-027764.pdf



This is the date you uploaded your Annual Report in NeT

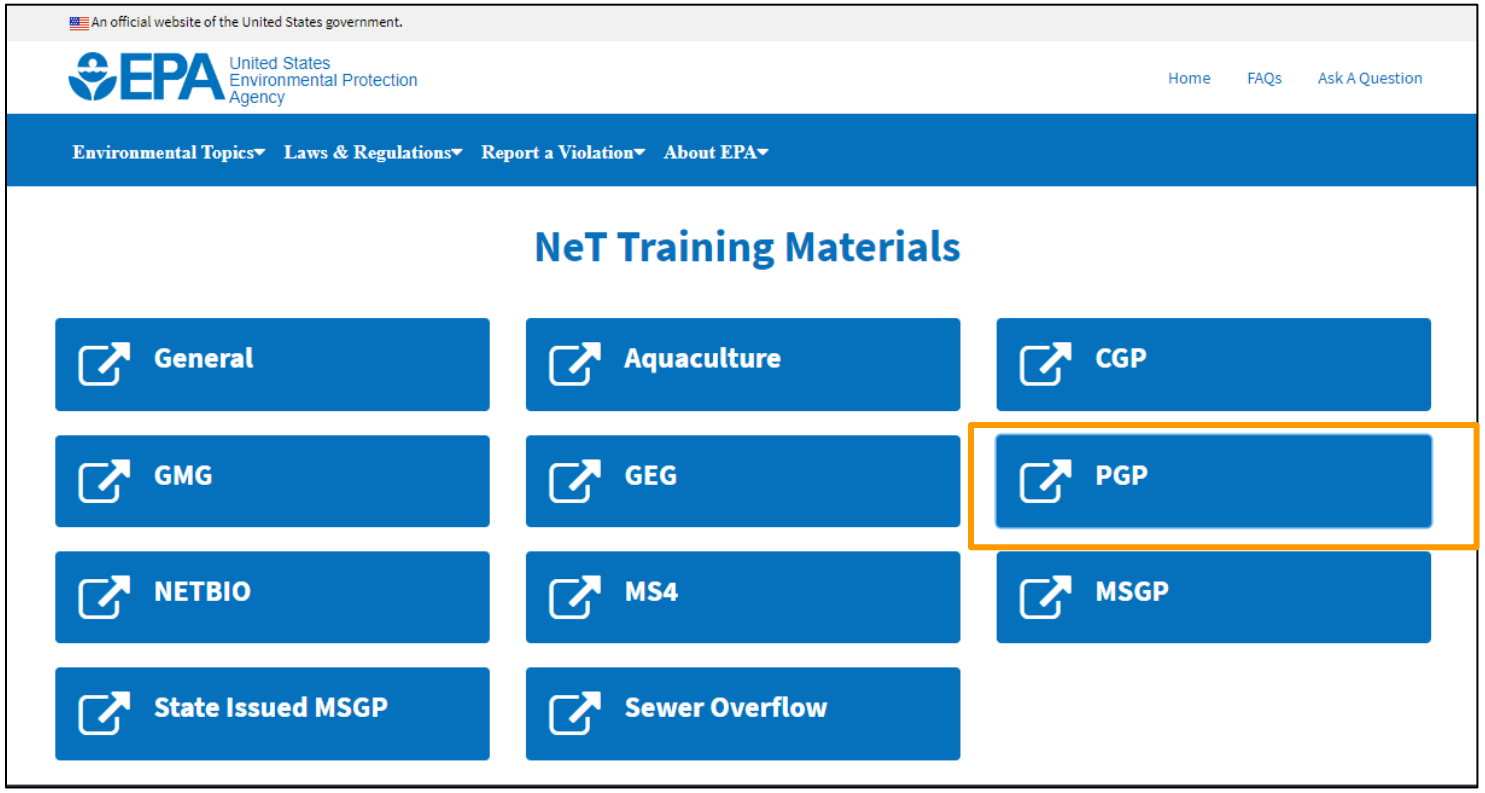
Resources

EPA NeT Support Portal: https://usepa.servicenowservices.com/oeca_icis?id=net_homepage

The NeT Support Portal has General NeT Info as well as information on NeT PGP

We will be adding the recording of this training and materials soon

Training link will also be available on the Utah Website



Useful Links:

Launch NeT PGP: https://npdes-ereporting.epa.gov/net-pgp/action/login

Utah PGP Website: https://deq.utah.gov/businesses-facilities/general-updes-pesticide-permit

NeT Support Portal: https://usepa.servicenowservices.com/oeca_icis?id=net_homepage

- NeT PGP Training Material
- NeT PGP Training Schedule
- New CDX User: Streamlined PGP Registration Guide
- General NeT Information
- New NeT Users

CDX Assistance

- Forgot CDX Password: https://cdx.epa.gov/PasswordReset/GetResetCode
- Forgot CDX User ID: https://cdx.epa.gov/AccountRecovery/ForgotUserId

Utah DWQ Contact Information:

If you have questions, contact:

- Don Hall at dghall@utah.gov or (801) 536-4492
- Or call Utah Division of Water Quality at (801) 536-4300

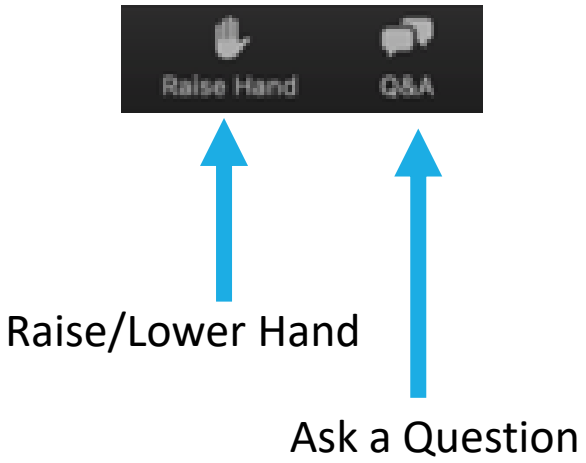
* You will have to contact UT (Don) directly for payment status updates

User Support Contact Information:

- EPA (NPDES eReporting) Helpdesk
  - ✓ServiceNow Support Request Form: https://usepa.servicenowservices.com/oeca_icis?id=oeca_csm_get_help_1&sys_id=dcf6a9b51b0378104614ddb6bc4bcb34
  - ✓Email: NPDESeReporting@epa.gov
  - ✓Phone: 1-877-227-8965
  - ✓Issues with CDX and NeT: Creating account in CDX, changing email address/Organization, requesting access to permit
- CDX Help Desk
  - ✓Email: helpdesk@epacdx.net
  - ✓Phone: 888-890-1995
  - ✓**ONLY** CDX related issues like editing CDX profile information (first & last name), i.e. If user's last name changed

Question and Answer Session

Please enter your questions in the Q&A pod or raise your hand and we will un-mute you to ask verbally.



Thank you for attending today's training!

Slides will be posted on the NeT Support Portal.

A short survey will appear on your screen momentarily, we would really appreciate your feedback.

OMB Control Number: 2030-0051 Expiration Date: 5/31/24

(Pursuant to 5 CFR § 1320.12(b)(2); approval for the current collection is automatically extended on a monthly basis during OMB's review of its renewal.)

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