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### Pre-proposal for FY 2002 State Innovation Pilot Grant Program Project Summary Information Page

<u>Applicant Information</u> Project Title:	"Smart NOIs:" Development of an Automated Decision Matrix for Managing AZPDES Stormwater NOIs. Phoenix, Arizona.
Name of Applicant:	Arizona Department of Environmental Quality
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This project is not being executed or funded in cooperation with another Federal program.

No regulatory flexibility from the Federal government is required to implement this project.

This project is supported by the Director of the Arizona Department of Environmental Quality, Jacqueline E. Schafer.

Summary Budget Information

#### [REDACTED BY US EPA]

We are requesting that pre-award costs be allowable under this grant for up to 120 days prior to the awarding of this grant.

#### Pre-Proposal Project Narrative

How does this project demonstrate "bigger, bolder" innovation and what vision do you have for the overall project?

The Arizona Pollutant Discharge Elimination System (AZPDES), the state managed analog of the National Pollutant Discharge Elimination System program, handles about 2,000 Notices of Intent to Discharge (NOIs) each year from projects and facilities seeking coverage under the Stormwater General Permit program. Current management of this program involves receiving paper NOIs, inspecting them for completeness, and entering them into a database. Those NOIs that have issues associated with them of one form or another are reviewed by program staff to determine if the facility or applicant needs to be contacted for further information or clarification of existing information. This additional review happens many days after receipt of the NOI, and the project has typically already commenced if it is a construction project. (The construction general permit requires submittal of a notification of intent to discharge only 48 hours before construction begins unless the facility or applicant is otherwise notified.)

With the beginning of the Stormwater Phase II program in 2003, the Arizona Department of Environmental Quality (ADEQ) will have a more significant challenge managing the receipt of NOIs as we estimate that more than 10,000 construction stormwater general permit NOIs may be submitted annually. This volume alone calls for a new way of doing business.

The "Smart NOI" program will be developed as a web application to make initial decisions about stormwater NOIs through a programmed decision matrix closely associated with a geographic information system. This decision matrix will automatically determine whether the NOI is needed by using a unique geographic identifier, perhaps something as fundamental as a zip code, to locate the site in relation to waters of the U.S. If there is no potential to discharge to a waters of the U.S., which is very possible in the arid Southwest, there is no need to apply, and the facility or applicant submitting the NOI is sent automatically a letter or e-mail notification confirming no need to apply.

If the decision matrix determines there is a waters of the U.S. in reasonable proximity of the discharge, the decision matrix further determines if there is a potential waiver from the stormwater program, through the erosivity waiver or through an established TMDL. As part of the "Smart NOI" program, the various geographic areas of the state, and their associated soil erosivity factors, will be included within the geographic information system, making it easy for the ADEQ to determine if the erosivity waiver can be granted. If the waiver can be granted, the "Smart NOI" system would automatically generate either a letter or an e-mail notification that the waiver is granted.

The web-based "Smart NOI" program decision matrix will also look at those parts of the NOI which, if marked, would suggest closer review by ADEQ for consideration that an individual

stormwater permit might be more appropriate. For example, if the geographic identifier on the NOI suggested that the discharge might occur near an impaired water, or a unique water, the ADEQ would want to discuss with the applicant the need for obtaining an individual permit. "Smart NOIs" would allow the ADEQ to contact that applicant for additional review during the 48 hour notice of intent to discharge period, and at the beginning of the construction period.

Finally, "Smart NOIs" will have an automatic data storage capability for those applicants who qualify for waivers, are sorted for individual permits, and those that are subject to the terms of the general permit. The data can then be electronically loaded into the appropriate ADEQ Oracle database, which feeds the national PCS application. This capability will allow the ADEQ to query the application to determine how many waivers are granted, where and why, and allows the loading of the NOIs to a database without the need for manual data entry.

"Smart NOIs' will allow the ADEQ to quickly process large volumes of NOIs for the stormwater program and make timely and appropriate decisions about duty to apply, waivers and need for individual permits. It will allow the ADEQ to manage the significantly increased workload brought about by the stormwater phase II program while continuing to protect Arizona's surface water resources.

# What are the goals and objectives of the project and what is the plan to measure and evaluate the project's expected results:

The overall goal of the "Smart NOIs" project is to design, construct, test and implement a "smart" Internet application, that includes a decision-making matrix to rapidly identify those applicants that need attention from those that either don't need to be in the program, or who don't need special attention. The specific goal of "Smart NOIs" is to identify within 48 hours after receipt, those facilities requiring individual review. A second goal is to have an automatic process for storing NOIs into an appropriate ADEQ database system without the need for additional manual entry.

#### Project Schedule and Time Frame

The following presents the proposed tasks and schedule to complete the project in one year.

1.	<u>TASK</u> Preparation of detailed project plan	<u>TARGET</u> 9/01/02 through 10/31/02
2.	Requirements analysis and design	11/01/02 through 12/31/02
3.	Programming and equipment configurations	1/02/03 through 2/28/03
4.	Web module testing and deployment	3/01/03 through 3/31/03
5.	System maintenance and staff training	4/01/03 through 8/31/03

#### **Target Priority Environmental Areas**

Priority Area 6.1: This proposal addresses improving water quality, specifically stormwater runoff.

#### Use of Incentives as a Tool

*Priority Area 6.2.1:* This proposed approach differs from current approaches in that its decisionmaking matrix allows for a web-based "smart system" approach to identifying those applicants for stormwater general permits that really need stormwater individual permits at the beginning of construction. The "Smart NOI" system will significantly expedite permitting resulting in important incentives for the regulated community.

#### **Transferring Innovation**

- Priority Area 6.2.3:ADEQ will develop and implement the "Smart NOI" program in preparation<br/>for implementing the Stormwater Phase II program as part of the AZPDES<br/>program in 2003. Successful implementation of "Smart NOI" will allow for<br/>successful implementation of the AZPDES stormwater phase II program.
- Priority Area 6.3: "Smart NOIs" will be able to work in any state stormwater program that uses Internet and Oracle database technology, and an associated geographic information system (including ArcIMS). With increasing demands on all Clean Water programs, and declining state and federal budgets, states must have the ability to find efficient ways to manage the increased program demands without hiring additional staff. Technology is the only way to achieve that efficiency. A smart information system is the only way to achieve both efficiency and environmental protection.

#### **Guaranteeing Measures and Accountability**

Priority Area 6.4.1:	The project's measurable benefits will be measured through quantitative and
	qualitative factors. The long-term measure of success will be determined based
	on the numbers of NOIs filed electronically versus the total number of NOIs
	received by ADEQ (quantitative factor). The short-term measure evaluates the
	efficiency of the "Smart NOI" system based on ADEQ response times to
	customers using this unique electronic approach (qualitative factor).
Priority Area 6.4.2:	The short-term indicator of success: At least 90 percent of users of the "Smart NOI" system are notified within 48 hours of their status based on stormwater program requirements.
Priority Area 6.4.3:	The long-term indicator of success: At least 50 percent of applicants file NOIs
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	using the "Smart NOI" process within five years.
	Proposal Budget

Total
Project
<u>Costs</u>

Proposed State <u>Leverage Funds</u>

EPA <u>Funding</u>

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