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Tips for Submitting Timely, Accurate, and Complete NPDES Discharge Monitoring Reports

> ➢ This U.S. EPA Compliance Advisory is directed to owners, operators, and permit holders of Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) regulated facilities with a Discharge Monitoring Report (DMR) submission requirement.
> ➢ The National Enforcement and Compliance Initiative (NECI) to reduce the rate of significant noncompliance (SNC) with NPDES permits includes a priority focus on reducing SNC caused by failure to submit a required DMR or submission of a faulty DMR. Learn more about the NECI here: SNC NECI
> ➢ Permittee failure to report timely, accurate, and complete DMRs is the single largest source of SNC nationwide. The SNC status for each facility with a NPDES permit is calculated by EPA (ICIS-NPDES) and this information is made publicly available at https://echo.epa.gov.
> ➢ Submission to the state or EPA of timely, accurate, and complete DMRs is a requirement of most NPDES permits and is key to both the CWA's compliance and enforcement scheme and to improving and protecting surface water and drinking water quality.
> ➢ This advisory is designed to help NPDES permittees comply with DMR reporting requirements in their permit and avoid noncompliance.

About the Significant Noncompliance National Enforcement and Compliance Initiative (SNC NECI)

The goal of the SNC NECI is to focus EPA and state enforcement and compliance resources towards the most serious NPDES violations and to improve compliance by using the full range of compliance assurance tools. Facilities that are included in this NECI, including NPDES facilities required to submit DMRs, are generally subject to increased monitoring, inspections, compliance reviews, and enforcement actions.

DMR Submission Requirements and Verifying Accuracy of Your Submitted Compliance Data

In 2019, EPA initiated the SNC NECI to improve NPDES permittee compliance. Compliance with NPDES permits is critical to improving and protecting our nation's waters. Permittee self-monitoring and self-reporting through the timely, accurate, and complete submission of DMRs is essential to ensuring compliance. Nationally, DMR reporting violations account for over half of the facilities in SNC status.

Failure by permittees to submit a DMR, late submission of a DMR, and submission of incomplete DMRs are all violations of NPDES permit requirements that are potentially subject to enforcement and penalties. Permittees must timely submit accurate and complete DMRs as frequently as their permit requires to avoid reporting violations.

Permittees are also encouraged to monitor their compliance status in EPA's Enforcement and Compliance History Online (ECHO) tool at https://echo.epa.gov. Using ECHO, permittees can verify that their DMR submissions and compliance status are correct and then notify their permitting authority of any inaccurate compliance status or violations. Taking these steps will ensure that your facility's compliance status is displayed accurately to the permitting authority and the public and will aid the permitting authority in correcting any errors. Note, in rare cases, SNC may be incorrectly designated in ECHO due to data entry errors or data transfer problems which adds to the value of permittee review of their DMR data and compliance status data.

DMR Submission Basics

All DMR submission requirements are described in the NPDES permit. These include the pollutant parameters to be reported, sampling frequency and type, and DMR submission frequency and due date. Each DMR submission must exactly adhere to the specified monitoring and reporting requirements in the permit. If you cannot locate this information in your permit or are otherwise uncertain, please contact your permitting authority for assistance.

DMR FAQs

Where do I submit my DMR?

EPA's 2015 NPDES Electronic Reporting Rule requires that permittees submit DMRs electronically, unless the permittee has obtained a waiver allowing manual DMR submission. EPA and many state permitting authorities require that permittees use EPA's electronic NetDMR system for reporting DMRs. Some states instead utilize their own electronic DMR (eDMR) reporting system. Permittees can identify which reporting system to use for submitting DMRs by checking their permit or by checking here: Reporting NetDMRs

TIP:

When in doubt about pollutant parameters, required sampling frequencies, sample types, DMR submission frequency, DMR due dates, or other monitoring and reporting matters, check your permit and/or contact your permitting authority.

If your permitting authority is using (and requires you to use) EPA's NetDMR system, you must obtain access to your DMR in NetDMR. The first step in this process is to create a CDX account. You can register for a CDX account at: https://npdes-ereporting.epa.gov/net-netdmr. Directions for creating a NetDMR account in CDX can be accessed here: Creating NetDMR Account. After creating a CDX account you will be able to access the NetDMR program service. You can access NetDMR at: https://npdes-ereporting.epa.gov/net-netdmr. Lastly, having accessed the NetDMR program service you must then request access to your specific permit(s) and request an appropriate participation level (Signatory or Edit role), as per NPDES permit requirements.

For accessing state eDMR systems (for states that don't use NetDMR), visit your permitting authority's website, or contact your permitting authority to learn how to create an account and access your eDMRs.

What should I do if I am having issues accessing my account to submit my DMR?

If you are having issues accessing your NetDMR/CDX account because you have forgotten your User ID or password, your password has expired, you failed too many log-in attempts, or have forgotten your security questions answers, navigate to the CDX log-in page at https://npdes-ereporting.epa.gov/net-netdmr and follow the steps to retrieve your User ID or change your password. If your log-in issues continue, try using a different browser or clearing the cache on your computer. If you are still having issues or need additional help, contact the EPA NPDES Helpdesk at NPDESeReporting@epa.gov or 877-227-8965, or if your state does not use NetDMR, contact your state's eDMR helpdesk or contact.

How do I submit my monitoring data and other DMR information?

Monitoring data and other DMR information can be directly entered into NetDMR or the data can be imported to NetDMR from a spreadsheet. Similarly, for non-NetDMR states, direct entry of DMR information is done in the state's eDMR system which also may allow the data to be imported from a spreadsheet. If you import your data to NetDMR, you must do this using a comma delimited or comma separated value format with a .TXT, .CSV or .zip file extension. Microsoft Excel templates and instructions for importing DMR data to NetDMR can be found here: Importing Data. Contact your permitting authority or visit their website for DMR submission requirements that may be specific to your permit.

Do I need to submit a DMR even if there was no discharge during the entire monitoring period?

Yes. Most eDMR systems, like NetDMR, require a submission of a scheduled DMR even if there is no discharge during the monitoring period. In NetDMR, you must apply a no data indicator (NODI) code "C - No Discharge" to *every parameter and value on the DMR form*. The NODI code can be applied to the entire DMR form in NetDMR by checking the Update NODI box on the DMR search results screen and then clicking the Update NODI button or by selecting appropriate NODI code from the Form NODI dropdown box within the DMR form. The last step after applying the appropriate NODI code is to sign and submit the DMR. Check with your permitting authority if you are unsure of how to properly report no discharge.

How do I report a parameter value that was below the detection limit or no detection?

Review your permit and/or contact your permitting authority for information about how to report non-detect lab results. Your permitting authority may have specific requirements for how to calculate averages when one or more of the sample

results are non-detect. They may also have specific requirements for when to report non-detect lab results as either less than the lab's reporting threshold value or as some other value that is listed on the lab results. They may also have specific requirements for when it is acceptable to report non-detect as NODI code B. Never select NODI C - "No Discharge," or enter a data value of "=0" to report non-detect lab results unless specifically directed to do so by your permitting authority. NetDMR allows you to use the less-than (<) symbol (along with the limit of detection value) if your regulatory authority or permit requires a value to be reported.

Who do I contact for support?

NetDMR users who have been issued permits by regulatory agencies other than the EPA should first try to contact the NetDMR help personnel associated with their state through the information listed here, NetDMR Contacts, before requesting help from EPA's NetDMR Helpdesk: by email, NPDESeReporting@epa.gov, or phone 877-227-8965. Again, other non-NetDMR state eDMR system users should have a similar Helpdesk option for system issues. When in doubt, contact your permitting authority.

For questions regarding your permit or DMRs (not concerning electronic DMR submission), contact your permitting authority. Additional EPA and state contacts are located here: https://www.epa.gov/npdes/contact-us-general-information-about-npdes.

Checking NPDES Permit Compliance Status in ECHO

The Enforcement and Compliance History Online (ECHO) (https://echo.epa.gov) website allows permittees to check their compliance status, including violations for failure to submit DMRs. This is done using the Detailed Facility Report option in ECHO.

To view a Detailed Facility Report for a specific facility, enter the NPDES permit ID # in the "Quick Search" box. In the Detailed Facility Report, scroll down to the "Enforcement and Compliance" section and "Three-Year Compliance History by Quarter" subsection. In this subsection, the row titled, "Facility-Level Status" will show the SNC and noncompliance history, and the "Quarterly Noncompliance Report History" row will show the primary cause of any SNC reported in the row above. One cause of SNC that can appear in this row is "Failure to Report DMR - Not Received." The "Quarter 12" column in this table shows the facility's most recent compliance status.

How do I check to ensure my DMRs are properly submitted?

For NetDMR users, the status indicator for each DMR in NetDMR is the best evidence of whether that DMR has been properly and successfully submitted. When a user initiates the Sign and Submit, they will be prompted for a password and presented with one of their CDX security questions (retrieved from CDX). Once the user's password and answer to the security question have been verified, the user will be taken to a screen informing them that the signing is being processed. The DMR will stay in the "Processed for Signing" status until the signing process is completed (successfully or not). The "Processed for Signing" status is not an indication of a problem. When all DMRs selected by the user have been processed (successfully or not), the user will be notified via email. For any DMRs that were not successfully signed, the user will need to manually retry the sign and submit process. Once DMRs have been successfully signed and processed successfully, the status will change to COMPLETED.

DMRs that have a "Completed" status meet the federal data reporting requirement of the permit for that monitoring period, although if required attachments were not included, the permitting authority will require revision/re-submittal for that DMR.

How do I check to ensure my compliance status is accurate?

Use EPA's ECHO tool to access your detailed facility report (see the box above) to review your permit's compliance status. Finally, if your facility is in violation of any permit requirements you should take prompt corrective action to ensure a return to compliance.

Common NetDMR DMR Errors

NetDMR has built-in functionality to assist permittees with proper DMR submission, generating soft errors and hard errors to help avoid submitting erroneous DMRs. A hard error is an error in the data that will prohibit the DMR from being submitted. Examples of hard errors include required fields being left blank, filling in two or more conflicting fields (e.g. when both a Sample Value and a NODI Code are entered), or entering an invalid character. A soft error is a warning to review data for accuracy and to then acknowledge that the data is correct (e.g. DMR Value exceeds the Permit Limit). Upon review, if reported data is correct, simply acknowledge having reviewed the error by checking the box. Acknowledged soft errors will not keep the DMR from being signed and submitted. Below are some explanations of common hard errors and soft errors. Note, to check for hard or soft errors in NetDMR you can click save and continue at the top or bottom of the DMR form and then reference the edit and check errors section at the bottom of the DMR form.

Error messages when adding attachments and signing your DMR

➢ Make sure there are no spaces or special characters in your attachment file name before attaching. Error messages when signing may be due to incorrectly submitting your password or security question. NetDMR will email you if the DMR submission fails and you must sign and submit again.

Units or sampling methods that do not match those required by the permit and sample values that exceed a permit limit

➢ Reporting the wrong units or sampling method in your DMR can generate an erroneous violation. If you do not use the units or sampling method required by your permit (or you have entered a value that exceeds an effluent limit), NetDMR will issue a soft error that provides you an opportunity to make a correction. You must confirm that the inputs creating the soft error are correct before submitting your DMR. You will avoid generating erroneous violations if you input your results in the proper units – and with the proper number of significant figures. Refer to your permit or contact your permitting authority if you have questions regarding the permit limits, sampling methods, units of measurement, number of significant figures, etc.

Missing values

➢ You must input a numeric value or a NODI code selection for each pollutant parameter reported in your DMR. To avoid submitting an incomplete DMR (a reporting violation), you cannot leave any parameter that is required to be reported blank. If you do not have a value to input for a parameter, select the appropriate NODI code to explain why you don't have it. In NetDMR, if you leave any parameter blank, a soft error will occur and require your confirmation before submitting.

Hard Errors

➢ Hard errors in NetDMR are caused by mistakes such as using improper special characters, character lengths that are too long, conflicting selections such as inputting a NODI code and a sample value for the same parameter, and using invalid NODI codes. Hard errors must be corrected before the DMR can be validated. The DMR must be validated before the permittee can sign and submit it. If you are unable to troubleshoot a hard error and therefore cannot submit your DMR, contact the NetDMR Helpdesk.

Invalid NODI codes

➢ Make sure you use the correct NODI code. When in doubt, check with your permitting authority to determine which NODI code is correct. In NetDMR, NODI codes "E - Analysis not conducted/no sample" and "P - Laboratory Error or Invalid Test" indicate a reporting violation.
➢ When there are no values to report because a discharge has not occurred within the monitoring period, "C - No Discharge" is the proper NODI code. Do not use NODI code "C" for reporting Below Detection Level/No Detection. When there is evidence of a discharge, but sampling has not been conducted, use NODI code "E."
➢ NODI codes that indicate permit violations require acknowledgement in NetDMR prior to signing and submitting the DMR.

Ensuring your that DMRs are timely, accurate, and complete, and that your compliance status is accurate are critical to protecting the nation's surface waters and will avoid incorrectly reporting violations that could result in enforcement action for otherwise compliant discharges. To assure submission of accurate DMRs, you should regularly check your permit's compliance status to ensure your facility remains in compliance and ensure the permitting agency has the correct data about your facility. Whenever you are in doubt, your permitting authority can help.

Additional Compliance Resources

In addition to the resources listed above, the following resources may help with complying with permit reporting requirements.

➢ Reducing Significant Noncompliance with NPDES Permits – Resources for NPDES Permittees and Other Organizations (https://www.epa.gov/enforcement/national-compliance-initiative-reducing-significant-non-compliance-snc-npdes-permits).
➢ NetDMR Support Portal (https://usepa.servicenowservices.com/oeca_icis?id=netdmr_homepage).