

## NetDMR Reporting with Mutual Agreement and Order Interim Limits

### What are Mutual Agreement and Orders?

The Oregon Department of Environmental Quality's Water Quality Program sometimes uses mutual agreement and orders to settle past and address future permit violations, especially when the permittee is unable to comply immediately. These orders may include requirements for studies, plans, upgrades and interim requirements. The orders establish a compliance schedule for the needed treatment system improvements and include interim limits which trigger DEQ enforcement. The orders also include specified stipulated penalties for failure to comply with the agreed-to schedule and for exceeding interim limits specified in the order.

### What is NetDMR?

National Pollutant Discharge Elimination System permit holders in Oregon must submit discharge monitoring reports electronically with the US Environmental Protection Agency's Network Discharge Monitoring Report system known as NetDMR. DEQ sets up the monitoring requirements and limits for each permit in NetDMR. Permit holders must complete the electronic forms for submittal.

### Do MAO Interim Limits Replace Permit Limits in NetDMR?

Permit limits only are set up in NetDMR. Mutual agreement and order interim limits do not replace permit limits. Accordingly, any permit limit exceedance will result in a "soft error" in NetDMR, even if the reported value is less than the order's interim limit.

### What do I need to do if the permit limits are exceeded?

Schedule F of the permit requires permit holders to submit a report with additional information for all instances of noncompliance. Exceeding a permit limit is a noncompliance, whether or not there is a mutual agreement and order. If the permit holder has an order with interim limits, the noncompliance report must still report any exceedances of permit limits, including the cause of the exceedances and steps taken or planned to prevent a reoccurrence. The noncompliance report should also state whether the interim limits were exceeded or not. Permit limit noncompliance reports are due with the monthly discharge monitoring report.

When reporting in NetDMR, the permit holder must acknowledge the permit limit exceedance. The permit holder should also include a comment about the order's interim limits and whether or not they were also exceeded. The comment should include the case number of the order.

### How Are Permit Limit Exceedances Resolved?

If the permit limits are exceeded, but the interim limits are not, DEQ will amend EPA's Integrated Compliance Information System to link the exceedances to the mutual agreement and order, resolving the violation. If the interim limits are exceeded, DEQ will issue a penalty demand notice for the stipulated penalties.

### Alternative formats

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, toll-free in Oregon at 800-452-4011, ext. 5696, or email [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us)



State of Oregon  
Department of  
Environmental  
Quality

### Water Quality Program

NetDMR Support Desk  
700 NE Multnomah St.  
Suite 600  
Portland, OR 97232  
Phone: 503-229-6400  
800-452-4011

Contact:

[NetDMRSupport@deq.state.or.us](mailto:NetDMRSupport@deq.state.or.us)

[www.oregon.gov/DEQ](http://www.oregon.gov/DEQ)