

### State of Oregon Department of Environmental Quality

### **NetDMR: Frequently Asked Questions**

Contact: NetDMR Support Desk 700 NE Multnomah St Portland, OR 97232

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### Do I Need to Register?

### Who must report electronically using NetDMR?

Electronic reporting affects all National Pollutant Discharge Elimination System regulated entities that are required to submit Discharge Monitoring Reports. These entities include all NPDES-permitted facilities, whether covered by an individual permit or general permit. Importantly, the rule does not change who is required to submit NPDES information. It only changes the method by which information is provided (i.e., electronic rather than paper-based).

At this time, **only Oregon's Individual NPDES permit holders** (major and minor dischargers) are required to register and begin using the NetDMR system. General permit holders will be incorporated into the system at a later time. DEQ will contact facilities with NetDMR registration instructions.

## What is the deadline to register in NetDMR for my Individual Minor NPDES permit?

Individual Minor NPDES permittees are required to start submitting DMRs in NetDMR Test by April 1, 2019, and in NetDMR Production by September 1, 2019. The latter is an enforceable compliance deadline.

## When will DEQ communicate with facilities that are covered under a general NPDES permit about eReporting?

Facilities covered under a general permit will begin eReporting at a later date. DEQ will post an update when available.

### Is my Water Pollution Control Facility (WPCF) permit accessible on NetDMR yet?

No. If the active permit(s) associated with your facility is a WPCF permit and not an NPDES permit, you are **not** required to use NetDMR for your DMR(s). Oregon DEQ does not currently have plans to process WPCF DMRs through NetDMR, so you don't need to take any action regarding NetDMR at this time.

### What is the difference between NetDMR Test and NetDMR Production?

NetDMR Production is the official NetDMR site, where NPDES permittees submit electronic DMRs for their facility that fulfill compliance requirements with their permits. NetDMR Test is a version of NetDMR that looks and operates nearly identically to NetDMR Production, and is used for permittees to practice electronic DMR submittals. DMRs submitted in NetDMR Test do not count towards compliance requirements for permits. Oregon permittees are required to use NetDMR Test successfully before they are granted access to NetDMR Production.

### How to Register

### **Creating an account in NetDMR Test:**

- 1. Go to <a href="https://test.epacdx.net">https://test.epacdx.net</a> and click "Register with CDX" underneath the login field.
- 2. Agree to the Terms and Conditions.
- 3. Choose NetDMR: Network Discharge Monitoring Report as your Program Service.
- 4. Choose NDMR-OR: NetDMR: Oregon DEQ.
- 5. Select your role from the drop-down list. If you are a permittee who will be signing DMRs, you need to select Permittee (signature). If you are a permittee who will not be signing DMRs, you need to select Permittee (no signature). If you are a contractor for the permittee who fills out DMRs but does not have signatory or administrative authority, you need to select Data Provider. If you are a DEQ employee or affiliate who reviews DMRs or provides administrative support, you need to select Internal User.
- 6. Complete the personal information requested.
- 7. Create your User ID, password, and security questions.
- 8. If you selected Permittee (signature) as your role, you will need to complete additional security questions to verify your identity when you sign documents electronically.
- 9. Search for your organization by entering its name and state and clicking "Find." If your organization does not appear, click "request that we add your organization" at the bottom of the search results screen.
- 10. Complete the requested contact information for your organization and send a verification code to your email address. Copy the verification code from your email and paste it into the corresponding box. Click "Register."
- 11. If you chose Permittee (signature) for your user role, you will be taken to an online form for identity proofing. An Electronic Signature Agreement (ESA) will be generated for you to verify and sign. There is also an option to print, sign, and mail a paper Signature Agreement instead.
- 12. Complete account setup and proceed to NetDMR.

### Creating an account in NetDMR Production:

- 1. Go to <a href="https://cdx.epa.gov">https://cdx.epa.gov</a> and click "Register with CDX" underneath the login field.
- 2. Agree to the Terms and Conditions.
- 3. Choose NetDMR: Network Discharge Monitoring Report as your Program Service.
- 4. Choose NDMR-OR: NetDMR: Oregon DEQ.
- 5. Select your role from the drop-down list. If you are a permittee who will be signing DMRs, you need to select Permittee (signature). If you are a permittee who will not be signing DMRs, you need to select Permittee (no signature). If you are a contractor for the permittee who fills out DMRs but does not have signatory or administrative authority, you need to select Data Provider. If you are a DEQ employee or affiliate who reviews DMRs or provides administrative support, you need to select Internal User.
- 6. Complete the personal information requested.
- 7. Create your User ID, password, and security questions.
- 8. If you selected Permittee (signature) as your role, you will need to complete additional security questions to verify your identity when you sign documents electronically.
- 9. Search for your organization by entering its name and state and clicking "Find." If your organization does not appear, click "request that we add your organization" at the bottom of the search results screen.
- 10. Complete the requested contact information for your organization and send a verification code to your email address. Copy the verification code from your email and paste it into the corresponding box. Click "Register."

- 11. If you chose Permittee (signature) for your user role, you will be taken to an online form for identity proofing. An Electronic Signature Agreement (ESA) will be generated for you to verify and sign. There is also an option to print, sign, and mail a paper Signature Agreement instead.
- 12. Complete account setup and proceed to NetDMR.

### Steps for new NetDMR users with existing CDX accounts:

- 1. Go to <a href="https://cdx.epa.gov">https://cdx.epa.gov</a> and enter your CDX User ID and password.
- 2. Click "Add Program Service."
- 3. Select NetDMR: Network Discharge Monitoring Report as your Program Service.
- 4. Select NDMR-OR: NetDMR: Oregon DEQ.
- 13. Select your role from the drop-down list. If you are a permittee who will be signing DMRs, you need to select Permittee (signature). If you are a permittee who will not be signing DMRs, you need to select Permittee (no signature). If you are a contractor for the permittee who fills out DMRs but does not have signatory or administrative authority, you need to select Data Provider. If you are a DEQ employee or affiliate who reviews DMRs or provides administrative support, you need to select Internal User.
- 5. Complete the identity proofing section if you are a Permittee (signature).
- 6. Complete account setup and proceed to NetDMR.

### **Subscriber Agreements**

### How do I access NetDMR Production and submit my Subscriber Agreement?

After you have successfully submitted test DMRs in NetDMR Test and are approved by your DMR reviewer to use NetDMR Production, you will need to register within the Production instance of NetDMR. This is a different website than NetDMR Test, so you should update any bookmarks you have set for NetDMR when you begin using NetDMR Production. After you create your account, you will request access to your permit, just as you did on the NetDMR Test site. You will be given the option to sign your Subscriber Agreement via paper or electronically. If someone else (e.g., Responsible Official) is authorizing your role as a Signatory Authority, then they will also need to sign the Subscriber Agreement. After DEQ receives the Subscriber Agreement, DEQ will grant you access to your permit in Production.

## I submitted a Subscriber Agreement. When will I be granted access to NetDMR Production?

If you submitted an electronic Subscriber Agreement and your DMR reviewer has approved you, you will be granted access to Production immediately. If you need same day approval, contact your DMR reviewer or alert the NetDMR Support Team at 503-229-6400.

If you printed and mailed a paper Subscriber Agreement and your DMR reviewer has approved you, the NetDMR Support team will manually grant your access when they receive the agreement. Please plan for and allow up to one week for Production access to be granted if you print and mail the agreement. After manual approval, you will be sent an email that confirms your registration.

If you submitted an electronic or paper Subscriber Agreement, but your DMR reviewer has not approved you, you will not be granted access to Production until you are approved. If you are not sure why you are not approved yet, please reach out to your DMR reviewer or NetDMR Support.

Your confirmation email will include the due date of your first NetDMR submission.

### Signatories/Administrators

### How many people can I assign a data entry role for my permit in NetDMR?

There is no limit on the number of people who can be assigned this role. Please note, however, that the permit holder — not necessarily the individual entering the data — is ultimately responsible for the accuracy of the data submitted.

### **Multiple Permits**

## Our facility has more than one permit, but I can only find one permit in NetDMR. Where is my other permit?

Due to the volume of permits that DEQ needs to enter into NetDMR, we are taking a phased approach. Please refer to the schedule on our webpage to see when your other permits are likely to be processed, or contact the DEQ NetDMR Support Desk at (503) 229-6400 or NetDMRSupport@deq.state.or.us.

### **Submitting Data**

## Will interim limits set by a Mutual Agreement and Order (MAO) be included in NetDMR?

No. DEQ only includes permit limits in your NetDMR setup. If your discharge exceeds permit limits but meets the interim limits set by a MAO, you should submit your DMR as usual and acknowledge the permit limit exceedances. It is helpful if you include a note that the discharge was within interim limits in the comment field or in an attached letter. DEQ will review the information you submit and resolve any violations that are covered under an MAO.

### **Additional Data: Formats**

### Once I fill in my DMR on NetDMR, am I done?

No, reporting in NetDMR has not changed your reporting requirements, just the way you report them. You will also need to attach the daily data and any additional required sampling data (e.g., E. coli). The easiest way to do this reporting is to attach the information that you would normally submit on paper in NetDMR as part of your DMR submission. The system accepts electronic files such as spreadsheets (preferred) and PDFs (appropriate for letters, lab reports, and QA/QC documentation). Please be sure the filename for any uploaded files conforms with the naming conventions specified on the NetDMR screens (e.g., no spaces in the filename).

## I use a spreadsheet now to calculate values based on formulas. Can I upload this data to NetDMR?

Yes. You can attach a spreadsheet file containing your calculations with your DMR submission. Also, EPA has guidance on using a CSV file to automatically populate your DMR data: https://netdmr.zendesk.com/hc/en-us/articles/360000468272-How-to-Import-DMR-s.

## How do I report daily data when NetDMR focuses on summary statistics? What if I want to communicate more data points to DEQ permit staff than my permit requires?

NetDMR allows for the electronic submittal of one or more attachments. DEQ anticipates that many permit holders may need to submit data that they collect such as daily data or data from multiple outfalls, but these options are not available in the NetDMR data entry screens. This type of data can be included with your submission as attachments. If in doubt, please contact your DMR reviewer or the DEQ NetDMR Support Desk.

## Our paper DMR forms included daily parameter values plus the summary statistics. NetDMR only lets us record the parameter summary statistics. What do we do with our daily monitoring values?

Check with your DMR reviewer. They may ask you to attach an additional spreadsheet or PDF that includes daily parameter data to the NetDMR submittal.

# The NetDMR web form seems to only include our MAIN OUTFALL monitoring data. We previously submitted data for other sampling and monitoring locations such as "Recycled Water" re-use and Biosolids/Sludge Monitoring. How are those groups of data handled in NetDMR?

In NetDMR, spreadsheet and text files can be attached and submitted, along with the parameter values added to the web form. Check with your DMR reviewer to see if they would like you to attach additional data files with your NetDMR submissions.

## I need to report my E. coli values for the reporting period. There are two lines for that. What do I do?

For reporting E. coli **always report the original values** in the following locations and attach additional monitoring as needed:

If none of the E. coli samples exceeded the permit limits	<ul> <li>Report the daily maximum and monthly geometric mean values in Monitoring Location Code Q, and</li> <li>Report NODI Code 9 for each field in Monitoring Location R</li> </ul>
If the original sample exceeded 406 organisms per 100 mL and the geometric mean of the five resamples was more than 126 organisms per 100 mL	<ul> <li>Report the daily maximum and monthly geometric mean values in Monitoring Location Code Q,</li> <li>Report NODI Code 9 for both fields in Monitoring Location R, and</li> <li>Confirm the violation at the bottom of the NetDMR screen</li> </ul>
If the original sample exceeded 406 organisms per 100 mL and the geometric mean of the five resamples was less than 126 organisms per 100 mL	<ul> <li>Report the daily maximum and monthly geometric mean values in Monitoring Location Code R, and</li> <li>Report NODI Code 9 in both fields of Monitoring Location Q</li> </ul>

## Unique Situations: Non-detect, non-discharge, unscheduled DMRs, resampling, etc.

## How do I fill out a DMR in NetDMR to show that the results of monitoring were non-detect?

There are NODI codes available in NetDMR to show that a result is non-detect. A copy of the laboratory analysis report can be submitted electronically as an attachment to back up the data reported. You can change the operator from "=" to "<" to match the laboratory analysis results if needed.

### My facility sometimes doesn't discharge at all in a month. How do I record that in NetDMR?

If your facility does not discharge during the month, you will select NODI Code C (No Discharge) at the top of the NetDMR form and submit it.

## How do I obtain an unscheduled DMR in NetDMR, so I can enter data for a month when sampling was conducted?

In NetDMR, go to the "Unscheduled DMRs" tab, select your permit number from the Drop Down menu, and push "Update." Select your Permitted Feature and Limit Set for your DMR month. Press "Submit" and your Unscheduled DMR will come up.

### **Missing Monitoring Data**

## Our facility is required to monitor daily but misses one day. Is there a NODI code for this?

No, NODI codes are only for when there are no data to report at all. Additionally, you can have either a NODI code or a value, not both. NetDMR will show you a hard error, which requires correction before you can submit the DMR. You should calculate the summary statistic with the rest of the data you collected and note in the Comments field at the bottom of the screen that you were missing a data point for that parameter.

## Our facility is required to monitor turbidity upstream weekly. The river was frozen for over a week. Samples were impossible to obtain.

If the river was frozen all month and you could not take any samples, use NODI Code 5 (Frozen Conditions). Otherwise you should calculate the summary statistic with the rest of the data you collected and note in the Comments field at the bottom of the screen that you were missing one or more data points for that parameter.

### **Conditional Limits**

## How is conditional monitoring handled in NetDMR? For example, we have different limits based on the flow volume for the DMR month.

In NetDMR, limits based on different flow volumes are often coded using different Monitoring Locations (ML) for the given parameter. A parameter value for a <u>low flow</u> limit might be reported under ML "O;" with the same parameter being reported under ML "P" for the <u>high flow</u> condition. The range of flows for each monitoring location are defined in the DMR Comments at the top of the NetDMR screen. It is important to record the parameter value in the ML row for the condition that applies for the current reporting month **AND** use NODI Code 9 (Conditional Monitoring Not Required) for the other MLs not being used. DEQ prepared a fact sheet with detailed instructions for this procedure: <a href="https://www.oregon.gov/deq/FilterDocs/Netdmrboppdss.pdf">https://www.oregon.gov/deq/FilterDocs/Netdmrboppdss.pdf</a>.

### Data Elements of the NetDMR Tool

### Are the data fields in NetDMR preformatted for significant digits?

No, but if a limit is listed, the data should be entered with the same number of significant digits as the limit.

## Can NetDMR be programmed with formulas or do I calculate statistics separately to determine compliance with my permit limits?

Enter the result of your calculations in the fields provided in your NetDMR screen.

### What is supposed to be entered in the column with the heading "# of Ex."?

That is the number of times a limit was violated during the monitoring period. You only need to use this field if you violated a limit more than one time, for example you exceeded a daily maximum limit 3 times in the month.

### **Viewing Your Permit**

## When I enter my DEQ permit number, why does it say that my permit is not in the system?

The NetDMR system uses EPA Permit ID numbers to identify permits. Therefore, anyone who uses their DEQ permit number to look up a permit will receive the "permit not in the system" message. Please enter your EPA Permit ID number (OR00XXXXX), and try again.

If you did enter the correct EPA Permit ID number and you are still receiving an error message, you may be in the wrong NetDMR region. Oregon permittees must use the Oregon DEQ version of NetDMR, but it is common for permittees to mistakenly select EPA Region 10 – Oregon instead. Because EPA Region 10 does not manage Oregon's NPDES permits, Oregon's Permit IDs are not available in their system. If this was the case, please go to MyCDX, click "Manage Your Program Services," click "NDMR-R10OR: NetDMR: EPA Region 10 – Oregon," and deactivate your role. Then, click "Add Program Service," select "NetDMR: Network Discharge Monitoring Report," and then select "NDMR-OR: NetDMR: Oregon DEQ." Select your role and click "Request Role Access."

## What is this permit number NetDMR is asking for? What are the other numbers on my permit?

When you log in to NetDMR, you can only use the EPA Identification Number (e.g. OR00XXXXX). NPDES permits also have DEQ permit numbers, which can usually be found in the upper right hand corner of the front page of the permit. There is also a file number located just below the permit number, which is helpful if you need to ask DEQ for copies of records (CORs) in your paper files at DEQ, or if you want to inform us in writing of a change to your facility contacts.

#### **Waivers**

### How can I request a waiver from NetDMR?

The waiver criteria and application form will be available on our website soon. NetDMR accounts can be accessed from any computer with access to the Internet, so not having a computer at a permit holder's office does not necessarily make a facility eligible to receive a waiver. If you are granted a waiver, an application fee will be imposed.

### **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, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email deginfo@deq.state.or.us.