

State of Oregon Department of Environmental Quality

Electronic Data Delivery (EDD) for Toxics Data:

Permit Holder Data Submittal Instructions

Water Quality Program

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Background:

DEQ requires all major and some minor NPDES permit holders in Oregon to perform a "Priority Pollutant Scan" and monitor their effluent and ambient conditions for the presence of various toxic chemicals. The basis for these requirements is found in the Oregon Administrative Rules and the Code of Federal Regulations (40 CFR 122). The requirements are promulgated through EPA's permit application forms and the permits issued by the DEQ. All major, and some minor, facilities are required to perform characterization monitoring for up to 170 toxic parameters. DEQ uses the monitoring results in the permit renewal process to determine if specific compounds require permit limits and to set effluent limits for those compounds. Monitoring data submitted by permit holders is used to characterize the effluent and ambient conditions, calculate site-specific water quality criteria and then determine if the discharge is likely to cause or contribute to an exceedance of Oregon's water quality criteria. This analysis is called a Reasonable Potential Analysis.

Generally there are 3 types of data collected and addressed by this memo:

- 1. Tier I Monitoring: effluent toxics characterization monitoring
- 2. Tier II Monitoring: ambient and additional effluent characterization monitoring
- 3. **Biotic Ligand Model**: temporally and spatially paired effluent and ambient data. This consists of both toxicity and general water quality data

In order to streamline the receipt and analysis of this characterization data, DEQ has developed an Electronic Data Delivery system. Under EDD, permit holders submit the toxics monitoring data required by their permit or permit renewal application in a standard format. The DEQ lab then performs a quality assurance check, identifies possible issues, attempts to resolve them and prepares the data for importation into the spreadsheet that DEQ permit writers use to perform the RPA.

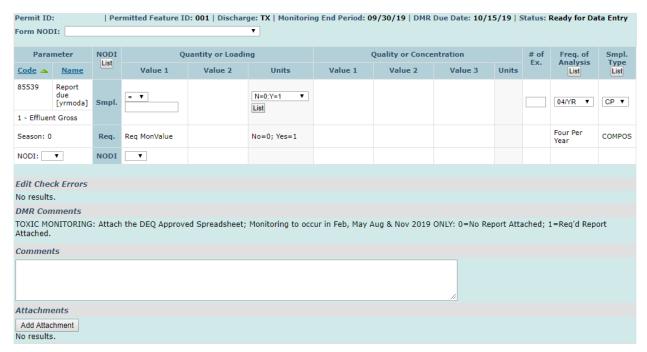
Submission Instructions:

- Review your NPDES permit or speak with your compliance inspector to determine
 if/when/where you are required to monitor for toxics. If you are unsure who your permit
 writer or compliance officer is call your regional office for help (see
 https://www.oregon.gov/deq/Pages/Offices.aspx). For questions about the BLM
 monitoring, please consult the applicable guidance here:
 https://www.oregon.gov/deq/wq/Pages/WQ-Standards-Copper.aspx
- 2. Prepare your data for upload by putting all sampling events for a specific type of monitoring (e.g. Copper BLM monitoring, RPA toxics) for the designated time period (data submission schedule determined by permit or compliance inspector) into the excel template. Instructions on how to fill out the excel template are included within the template. If you have questions after reading the instructions, please contact the DEQ Lab at PermitDataHelp@deq.state.or.us.
 - a. Share a copy of the blank template with your analytical laboratory. The lab should be able to supply all of the data requested in the template on the sheet labelled "Results" columns B through W (you will likely need to supply Column A-Monitoring Location). Note that you will need to fill in any data pertaining to sample temperature or pH (or any other results not analyzed by the lab).
 - b. It is recommended that you save a copy of the excel template and fill out the "Organization Details" section. Please check every time you submit data to ensure that your Organization Details remain updated and accurate.
 - c. Include monitoring location information in the "Monitoring Locations" sheet.
 - d. Once you are finished adding data, save your excel with the following naming convention: OregonPermitNumber_MonitoringType_Sampling
 Quarter/Month_Year.xlsx (e.g. OR1000000_CopperBLM_March_2019.xlsx or OR1000000_Tierl_Q1_2019.xlsx)
- 3. Upload the following to NetDMR (https://cdx.epa.gov) as an attachment (see next section).
 - a. a copy of the **excel template with your data** (see EXAMPLE-Results sheet in the excel template for guidance) and
 - b. a copy of the **Tier II (aka Level II) laboratory reports** Please note that laboratory reports should include laboratory quality control results (e.g. method blanks, matrix spikes). If the laboratory report does not contain a copy of the Chain of Custody (COC) Form, please include a pdf of the COC with your upload.
- 4. If you are unsure whether you are able to submit EDD toxics data to NetDMR or if you are not set up in NetDMR, please contact the NetDMR support staff (NetDMRSupport@deq.state.or.us or (503) 229-5029).

Attaching Data Sheets in NetDMR:

NetDMR has been set up with DMRs specifically for EDD reports. These are named with an outfall number (e.g., 001) and -TX or -TA for effluent toxics characterization monitoring and -CU for Copper Biotic Ligand Model monitoring (e.g., 001-CU).

The EDD-specific DMRs contain comments specific to your monitoring and reporting requirements. The DMRs contain a single parameter that indicates if you are submitting a report: Report due [yrmoda]. If you are attaching the report, enter 1 in the Value 1 field for the Report due [yrmoda] parameter; enter 0 if you are not submitting a report. Please note that a Tier II laboratory report is required as part of the EDD submission, and if you do not submit a lab report your submission will be considered incomplete. Use the Add Attachment button at the bottom of the screen to browse to and attach files. Note that file names for attachments cannot contain any spaces, and certain punctuation is prohibited. Please use the naming convention outlined in the submission guidelines (see above) when uploading eDMR attachments. Once you have attached the required documentation, you can sign and submit the DMR.



What you can expect after data submittal:

DEQ will complete the following tasks within a month of receiving a complete set of data (Complete set of data includes **excel of results**, **laboratory report**, and **COC**).

- Review of data, including laboratory QA/QC and sample collection documentation
 - Depending upon data quality, permittee may be contacted for clarifications
 - For datasets with significant data issues (e.g. missing analytes, inappropriate analytical methods, or sample collection issues) the permittee may be asked to resample by their compliance inspector.
- Qualify data as appropriate
- Upload data to DEQ's AWQMS data system
- Assist with unresolved QA/QC issues
- Write up findings in a report to be shared with the permittee that will cover the following:
 - Number of monitoring events

- List of pollutants sampled
- List of Quantitation limits met/not met along with discussion of qualifiers (if any)
- List of methods used that are not listed in CFR 136 (if any)
- Narrative regarding issues such as matrix interference and QC and if warranted, recommendations for resampling.
- Data will be made available to the Permit Writer for permit development purposes

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@deg.state.or.us.