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Subject: Guidance Memo No. 07-2013

CEDS DMR Data Entry Rules

To: Regional Directors

From: Ellen Gilinsky, Ph.D., Director Ulw Munduy

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Copies: Deputy Regional Directors, Regional Compliance Managers, James Golden, Rick Weeks, OWCP staff

Summary:

The purpose of this guidance is to provide the regional water compliance auditing staff with the updated CEDS Discharge Monitoring Report (DMR) data entry rules so that the DMR data will be assessed for compliance in a certain and consistent manner throughout the state. This guidance replaces the DMR Data Entry Rules issued on September 10, 2002. The update is necessary to keep up with the recent changes in CEDS and the Virginia Pollutant Discharge Elimination System (VPDES) permit requirements, and to ensure that the data entered in the CEDS DMR screen are compatible with DEQ's Compliance Auditing System (Points Program).

Electronic Copy:

An electronic copy of this guidance in PDF format is available for staff internally on DEQNET, and for the general public on DEQ's website at: <u>http://www.deq.virginia.gov.</u>

Contact information:

Please contact Lily Choi, Office of Water Compliance Programs, at (804) 698-4054 or <u>ychoi@deq.virginia.gov</u> with any questions regarding the application of this guidance.

Disclaimer:

This document is provided as guidance and, as such, sets forth standard operating procedures for the agency. However, it does not mandate any particular method nor does it prohibit any particular method for the analysis of data, establishment of a wasteload allocation, or establishment of a permit limit. If alternative proposals are made, such proposals should be reviewed and accepted or denied based on their technical adequacy and compliance with appropriate laws and regulations.

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CEDS DMR DATA ENTRY RULES

Introduction

The Discharge Monitoring Report (DMR) data entry rules were first issued on September 10, 2002 by the Office of Water Permit Programs and distributed to the regional compliance auditors. Since then, numerous changes have been made to the VPDES permits such as the QL requirements and CEDS as a part of the Electronic Discharge Monitoring Report (E-DMR) project. In order to prevent the Compliance Auditing System (Points Program) from failing, a screening was added prior to the monthly Points Program run in 2005. The screening detects the data entry errors which in most cases could be prevented if the DMR data entry rules were followed. The purpose of this guidance is to provide regional water compliance auditing staff with the updated CEDS DMR data entry rules and to ensure that the DMR data will be assessed for compliance in a certain and consistent manner throughout the state. For additional data entry rules relative to the CEDS functionality, staff should refer to the CEDS Water Compliance User Manual: http://deqnet/docs/CEDS/CEDS%20Water%20User%20Manual%202007/ChapterIVCEDSWaterComplianceManual.doc

Data Entry Rules

- 1. Received Date
 - If a paper DMR is received by the 15th of the month, key the date received into CEDS. If the DMR is received after the 15th of the month, check the envelope and key the postmark date into CEDS.
 - If a revision is received, enter the received date (without consideration of postmark) and the reason for revision (including parameter code if applicable) in the comments field. Do not change the received date in the Received Date field for the original submission.
- 2. Quantification Level (QL) parameters
 - When a permit contains limits with specific QLs, and the reported value is less than QL, enter "<QL" (case sensitive). The parameter-specific QLs and the specific reporting instructions for these parameters are included in the permit Part I.B. Special Conditions. See the standard language in the VPDES Permit Manual: http://deqnet/docs/water/Water_permit/VPDES_Permit_Program/VPDES_MANUAL_2007/SECTION_MN-3.doc
- 3. Nondetect (ND) parameter limits
 - In instances where the limit is "Nondetect" (e.g., Federal effluent guidelines for paper mills) and the permittee reports ND on the DMR, translate ND to less than QL and enter "<QL" (case sensitive) in CEDS.

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4. Contingent parameters

• Enter "NR" (case sensitive), which stands for not required, into CEDS for contingent parameters when monitoring is not applicable. For example, if a facility is equipped with chlorine and UV for disinfection, then Total Residual Chlorine (pram codes 157, 165 and 213) could become contingent parameters when UV is employed during the monitoring period. Enter "NR" for these contingent parameters. However, when chlorine is employed during the monitoring period, E. coli or enterococci could become the contingent parameter which should be entered as "NR".

5. Contingent outfalls

- Enter "NR" (case sensitive) into CEDS for all parameter requirements for contingent outfalls when no report is received for the monitoring period. Enter the received date as 10th of the month. This is only applicable if the permit states that the DMR submittal is contingent upon discharge. (Do not check the "No Discharge" indicator box unless a DMR was submitted with that information.)
- 6. Representative outfalls
 - Enter the reported data from a DMR that is representative of other outfalls into the CEDS screen(s) for each non-sampled outfall that the reported DMR represented. Some permits allow the sampling of one outfall to be representative of other outfalls so that not all outfalls are actually sampled. When a permit containing representative outfalls is issued, reissued, or modified the permit writer should make notation in the "comments" section of the DMR indicating which outfalls that particular DMR represents.

7. Seasonal parameters

• Enter DMR data for the "in season" parameter and enter "NR" for the "out of season" parameter, if populated. If the reporting frequency for the seasonal parameters (each has its distinct parameter code) is non-monthly (i.e., bi-monthly or quarterly), both "in season" and "out of season" parameters will be populated. In order to avoid any negative impact on the e-DMR system, do not remove the "out of season" parameter but enter "NR" instead. This will not be an issue for the monthly parameters because only the "in season" parameter will be populated in the CEDS DMR screen.

8. Unreported parameters

• In cases where no data are reported, enter "X" (case sensitive) into the appropriate parameter fields and check the appropriate check box in the header section of the CEDS DMR screen (Deficient DMR (25% or more data missing) or Incomplete DMR (less than 25% data missing)).

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9. Others

- When keying DMR data into CEDS, do not use commas in the QTYAVG, QTYMAX, CONCMIN, CONCAVG, or CONCMAX fields. The use of commas causes the data to be rejected in the EPA's Permit Compliance System (PCS) during upload. It may also fail DEQ's Points Program.
- In instances where CEDS does not automatically populate outfalls and parameters and the permittee reports "No Discharge" on their DMR, along with checking the "No Discharge" indicator box, be sure to manually link all pertinent parameters for major permits on the CEDS DMR screen; otherwise the data will appear in PCS and subsequently on the Violation Recognition Report (VRR) and Quarterly Non-compliance Report (QNCR) as absent data. Incomplete/missing skeleton records could occur when the "Administratively Continued" box was not checked in time to have the skeleton records populated automatically in the transition period.
- Negative values ("-"or minus) may be reported for parameter codes 079, 082, 083, 727 (Heat rejection), 820 (Temperature rise, Dec-Feb), and 224 (TOC net increase). Greater than (">") and Less than ("<") values are acceptable but they are considered as flagged data and required to be assessed manually for compliance.
- Frequently found data entry errors include: "QL", "ql", "<ql", "x", "NA", "N/A", "n/a", "NL", "ND", and "%".