



# 2015 NPDES ELECTRONIC REPORTING RULE (40 CFR PART 127)

**Current State of Events**  
**2017 NERPCA Annual Workshop**  
**Alexis Rastorguyeff, PE**  
**New Hampshire Dept. of Environmental Services**

# OVERVIEW

- All reporting under the NPDES Permit Program will transition from paper to electronic submission.
- Transition required to be complete by December 21, 2020.
- Transition of operational DMR (Part 122) and federal sludge data reporting (Part 503) “completed” on December 21, 2016.
- Transition of the remainder of reporting requirements (Part 122, 125, 403 and Part 503) is required to be completed by final date.



# OVERVIEW

- Committee of 80+ local, state and federal pretreatment regulators formed in early 2017 to figure out how to implement the Rule as it applies to industrial pretreatment.
- Committee met via web-conference about every two weeks for nearly six months.
- Committee developed document outlining the tasks/issues that need to be implemented/resolved going forward.



# OVERVIEW



## IMPLEMENTATION TECHNICAL PAPER NO. 7

**TO:** EPA Regional and Authorized State NPDES Permit and Enforcement Coordinators and State Information Technology Staff

**FROM:** John Dombrowski, P.E., Deputy Director  
Office of Compliance  
US EPA/OECA

**DATE:** 21 August 2017

**SUBJECT:** Implementation Technical Paper No. 7: Data Entry Guidance for Pretreatment Data Elements

The NPDES Electronic Reporting Rule ("final rule") requires the electronic reporting and sharing of NPDES facility and operational information. As part of EPA's collaboration with the states to move forward with converting the NPDES program from paper to electronic reporting, EPA is developing a series of implementation technical papers to help EPA regions and state NPDES programs make a smooth transition. This is the seventh of these implementation technical papers and this paper provides data entry guidance for pretreatment related information.

This paper was developed based on recommendations from the EPA-state Pretreatment Technical Workgroup. This workgroup usually met bi-weekly from March 2017 to September 2017 and included 86 subject matter experts from EPA Headquarters, nine EPA Regions, and 30 states. EPA distributed the second version of this paper to EPA Regional and state NPDES permitting and enforcement coordinators as well as state information technology staff (the IPT and ICIS-NPDES users). EPA thanks the commenters for their time and efforts to review this paper and provide feedback. This version incorporates these comments. EPA will publish this paper on its website to assist authorized NPDES programs with implementation of the final rule.<sup>1</sup> EPA also plans to provide updates on the progress states are making in sharing these data through regularly scheduled meetings (e.g., ICIS-NPDES IPT monthly meetings, ICIS-NPDES user monthly meetings), the ECHO "NPDES eRule Readiness and Data Completeness Dashboard," as well as through e-mail news alerts.<sup>2</sup>

<sup>1</sup> See: <https://www.epa.gov/compliance/npdes-ereporting>

<sup>2</sup> See: <https://www.epa.gov/compliance/npdes-ereporting-help>

Among other things, the final rule lists the information ("data elements") to be provided, groups this information by types of reports and identifies the regulatory citations requiring the information. EPA has taken a number of steps to assist the states and regulated community in moving forward with submission of this information. This includes development of electronic reporting forms and outreach efforts to test these forms for ease of submission and accessibility. This paper represents another step in EPA's effort to aid the electronic reporting effort.

This paper supports implementation of the final rule by providing further information for the data elements identified in the final rule (Appendix A to 40 CFR 127). In particular, this paper provides data entry guidance for the pretreatment information submitted during NPDES permit applications, compliance monitoring data submitted by NPDES-regulated entities, and compliance monitoring data submitted by EPA or states. These data elements document the measures taken to protect public health and the environment from any industrial discharges to POTWs. These data elements are included in the following NPDES Data Groups:

- Core NPDES Permitting, Compliance, and Enforcement Data [40 CFR parts 122, 123, 403, 503];
- General Permit Report: Notices of Intent to discharge (NOIs) [40 CFR 122.28];
- Pretreatment Program Reports [40 CFR 403.12(i)]; and
- Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs [40 CFR 403.12(e) and (h)].

Prior to electronic reporting, these data elements were most often reported on paper and in non-standard formats. Paper reporting of these data limited the availability and utility of these data on a national scale as key data from these reports were not generally standardized, aggregated, or publicly available. Upon full implementation of the final rule, authorized NPDES programs, EPA, and the public will be able to better identify and evaluate the measures taken to protect public health and the environment from industrial discharges to POTWs.

Sharing these data with EPA's national NPDES data system (ICIS-NPDES) is particularly useful when the NPDES program is 'split' between a state and EPA Region. For example, a state may be authorized for the core NPDES program (40 CFR part 122) but not the Federal pretreatment program (40 CFR part 403). For some states the NPDES program is split between EPA and the state as currently 14 states are not authorized to run the Federal pretreatment.<sup>3</sup> Proper use of these data elements and timely sharing with EPA's national NPDES data system (ICIS-NPDES) will allow both EPA and states to clearly identify all SIUs and CIUs and the corresponding public health and environmental protective measures taken by approved pretreatment programs, states, and EPA. This information can also be particularly useful for EPA and the eight states that are authorized to run the Federal Biosolids (Sewage Sludge) (40 CFR part 503).

EPA will use this technical paper to develop electronic reporting tools and to update NPDES data sharing protocols and schemas, EPA's NPDES data system (ICIS-NPDES), and the forthcoming NPDES Noncompliance Report (NNCR).

EPA will work collaboratively with authorized NPDES programs on the recommended actions in this paper. Authorized NPDES programs can request training or data entry help from EPA by sending an email to: [NPDESereporting@epa.gov](mailto:NPDESereporting@epa.gov).

<sup>3</sup> See: <https://www.epa.gov/npdes/npdes-state-program-information>



# WHAT DOES THIS MEAN FOR PRETREATMENT?

- Data from SIU periodic reports will need to be electronically filed.
- Control Authority (CA) Annual Reports will need to be electronically filed.
- If CA annual report indicates a SIU is in Significant Non-Compliance (SNC) specific data relating to the SNC will need to be electronically filed.
- If EPA or the State is the CA, the SIU will itself have to file its periodic report electronically.



# WHAT DOES THIS MEAN FOR PRETREATMENT?

- Findings from inspections and audits of approved programs will need to be electronically filed.
- When a NPDES permit application or notice of intent is filed, basic information on SIUs served by the POTW will need to be electronically filed.



# WHAT DOES THIS MEAN FOR PRETREATMENT?

Attachment 1: Data Elements Discussed in this Paper (taken from Appendix A to 40 CFR 127)

Data Elements Specific to Pretreatment Program Reports [40 CFR 403.12(f)]		
Data Name	Data Description	NPDES Data Group Number
SNC Published	A unique code (e.g., "Yes", "No") that identifies for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial Users (NSCIU) in SNC whether the Control Authority published a public notice within the reporting period.	7
SNC with Pretreatment Enforceable Compliance Schedule Status	The unique code/description that identifies for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) in SNC whether the industrial user in SNC is subject to one or more enforceable compliance schedules within the reporting period.	7
Local Limits Adoption Date	This is the most recent date on which the Control Authority adopted new local limits within the reporting period. The date must be provided in YYYY-MM-DD format where YYYY is the year, MM is the month, and DD is the day. The Control Authority can leave this data element blank on the Pretreatment Program Report if the Control Authority did not adopt any new local limits within the reporting period.	7
Local Limits Evaluation Date	This is the most recent date on which the Control Authority completed an evaluation on the potential need for local limits within the reporting period. The date must be provided in YYYY-MM-DD format where YYYY is the year, MM is the month, and DD is the day. The Control Authority can leave this data element blank on the Pretreatment Program Report if the Control Authority did not evaluate any local limits within the reporting period.	7
Local Limits Pollutants	This is the list of the pollutants for which the Control Authority adopted local limits. The Control Authority will only need to enter each pollutant once no matter how many treatment works are managed by the Control Authority. The Control Authority can leave this data element blank on the Pretreatment Program Reports if the Control Authority did not change the pollutants for which the Control Authority derived local limits.	7
POTW Discharge Contamination Indicator (Program Report)	The one or more unique codes/descriptions that identify any problems (e.g., pass-through, interference, violation of NPDES permit limits) with the receiving POTW's effluent discharge within the reporting period. See 40 CFR 403.3(k) and (p). EPA regulations require the Control Authority to develop and enforce local limits when the discharge from an IU causes or contributes to any problems at the receiving POTW.	7
POTW Biosolids or Sewage Sludge Contamination Indicator (Program Report)	The one or more unique codes/descriptions that identify any problems (e.g., interference with the use or disposal of biosolids or sewage sludge, violation of NPDES permit requirements or EPA's regulations at 40 CFR part 503) with the receiving POTW's biosolids or sewage sludge within the reporting period. See 40 CFR 403.3(k). EPA regulations require any Control Authority that must develop a Pretreatment Program also to develop and enforce local limits to ensure that the discharge from an IU does not cause or contribute a disruption of biosolids' use or disposal at the receiving POTW.	7



# WHAT DOES THIS MEAN FOR PRETREATMENT?

Data Elements Specific to Pretreatment Program Reports [40 CFR 403.12(i)]		
Data Name	Data Description	NPDES Data Group Number
Industrial User Control Mechanism Status	A unique code/description that identifies whether the Industrial User is subject to an effective Control Mechanism within the reporting period.	7
Industrial User Control Mechanism Effective Date	The date when the active Control Mechanism for the Industrial User became effective. The date must be provided in YYYY-MM-DD format where YYYY is the year, MM is the month, and DD is the day.	7
Industrial User Control Mechanism Expiration Date	The date when the active Control Mechanism for the Industrial User will expire. The date must be provided in YYYY-MM-DD format where YYYY is the year, MM is the month, and DD is the day.	7
SNC with Pretreatment Standards or Limits (Program Report)	This data element will identify for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) whether the IU was in Significant Non-Compliance (SNC) with any pretreatment standard or local limits applicable to the industrial user's discharge within the reporting period.	7
SNC with Pretreatment Standards or Limits Pollutants (Program Report)	This data element will identify for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) the pollutants that related to the industrial user's Significant Non-Compliance (SNC) status with any applicable pretreatment standard or local limits within the reporting period.	7
SNC with Reporting Requirements (Program Report)	This data element will identify for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) whether the IU was in Significant Non-Compliance (SNC) with reporting requirements (including baseline monitoring reports, notice of potential problems, periodic self-monitoring reports, notice of change in Industrial User discharge, hazardous waste notification and BMP certification) within the reporting period.	7
SNC with Other Control Mechanism Requirements (Program Report)	This data element will identify for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) whether the IU was in Significant Non-Compliance (SNC) with any other control mechanism requirements within the reporting period. This data element does not include instances of SNC that relate to the industrial user's applicable discharge standards or local limits or reporting requirements.	7
Listing of Months in SNC	This data element will identify for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) the month or months the IU is in SNC within the reporting period. These data must be provided in YYYY-MM format where YYYY is the year and MM is the month.	7
Number of Industrial User Inspections by Control Authority	This data element will identify for each Significant Industrial User (SIU) the number of inspections conducted by the Control Authority within the reporting period.	7
Number of Industrial User Sampling Events by Control Authority	This data element will identify for each Significant Industrial User (SIU) the number of complete sampling events conducted by the Control Authority within the reporting period.	7





# WHAT DOES THIS MEAN FOR PRETREATMENT?

Data Elements Specific to Pretreatment Program Reports [40 CFR 403.12(i)]		
Data Name	Data Description	NPDES Data Group Number
Number of Required Industrial User Self-Monitoring Events	This data element will identify for each Significant Industrial User (SIU) the number of required self-monitoring sampling events within the reporting period that must be reported to the Control Authority.	7
Actual Number of Industrial User Self-Monitoring Events	This data element will identify for each Significant Industrial User (SIU) the actual number of self-monitoring sampling events within the reporting period submitted to the Control Authority.	7
Types of Industrial User Enforcement Action	This data element will identify for each Significant Industrial User (SIU) the type(s) of formal enforcement action(s) (e.g., formal notices of violation or equivalent actions, administrative orders, civil suits, criminal suits) issued by the Control Authority within the reporting period. The Control Authority can also optionally use this data element to track informal actions that they issued within the reporting period.	7
Number of Industrial User Enforcement Actions	This data element will identify for each Significant Industrial User (SIU) and for each type of enforcement action the total number of formal enforcement actions issued by the Control Authority within the reporting period. The Control Authority can also optionally use this data element to track informal actions that they issued within the reporting period.	7
Industrial User Cash Civil Penalty Amount Assessed	For civil judicial Enforcement Actions, the dollar amount of the penalty assessed against each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) within the reporting period as specified in the final entered Consent Decree or Court Order. For Administrative Enforcement Actions, it is the dollar amount of the penalty assessed in the Consent/Final Order.	7
Industrial User Cash Civil Penalty Amount Collected	For civil judicial Enforcement Actions, the dollar amount of the penalty collected from each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) within the reporting period. For Administrative Enforcement Actions, it is the dollar amount collected of the penalty assessed in the Consent/Final Order.	7
Industrial User POTW Discharge Contamination Indicator (Program Report)	The one or more unique codes/descriptions that identify for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) whether the Industrial User caused or contributed to any problems (e.g., pass-through, interference, violation of NPDES permit limits) with the receiving POTW's effluent discharge in the previous reporting period. See 40 CFR 403.3(k) and (p). EPA regulations require the Control Authority to develop and enforce local limits when the discharge from an IU causes or contributes to any problems e.g. at the receiving POTW.	7



# WHAT DOES THIS MEAN FOR PRETREATMENT?

Data Elements Specific to Pretreatment Program Reports [40 CFR 403.12(i)]		
Data Name	Data Description	NPDES Data Group Number
Industrial User Biosolids or Sewage Sludge Contamination Indicator (Program Report)	The one or more unique codes/descriptions that identify for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) whether the Industrial User caused or contributed to any problems (e.g., interference with the use or disposal of biosolids or sewage sludge, violation of NPDES permit requirements or EPA's regulations at 40 CFR part 503) with the receiving POTW's biosolids or sewage sludge in the previous reporting period. See 40 CFR 403.3(k). EPA regulations require the Control Authority to develop and enforce local limits when the discharge from an IU causes or contributes to any problems e.g.at the receiving POTW.	7
Industrial User Wastewater Flow Rate (Program Report)	This data element will identify for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) the maximum monthly average wastewater flow rate (in gallons per day) in the previous reporting period.	7
Middle-Tier Significant Industrial User Reduced Reporting Status	The unique code/description that identifies for each Middle-Tier Significant Industrial User (MTSIU) whether the Control Authority has granted reduced reporting requirements in accordance with 40 CFR 403.12(e)(3).	7
Non-Significant Categorical Industrial User (NSCIU) Certification Submitted to Control Authority	The unique code/description that identifies for each Non-Significant Categorical Industrial User (NSCIU) whether the facility has reported its required annual compliance certification to the Control Authority within the reporting period.	7
Notification of Changed Discharge Submission	The unique code (e.g., "Yes", "No") that identifies for each Significant Industrial User (SIU) and Non-Significant Categorical Industrial User (NSCIU) whether the Industrial User submitted a notification within the reporting period to the Control Authority of a substantial change in the volume or character of pollutants in their discharge, including the listing or characteristic hazardous wastes for which the Industrial User previously submitted notice.	7



# WHAT DOES THIS MEAN FOR PRETREATMENT?

Pretreatment Inspection Data Element (Authorized NPDES Program under 40 CFR part 503)		
Data Name	Data Description	NPDES Data Group Number
Deficiencies Identified Through the Pretreatment Compliance Monitoring	This is the unique code/description that identifies each deficiency in the POTW's authorized pretreatment program for each pretreatment compliance monitoring activity (e.g., inspections, audits) by the regulatory authority. The values for this data element will distinguish between noncompliance and significant noncompliance (SNC). These unique codes include: (1) failure to enforce against pass through and/or interference; (2) failure to submit required reports within 30 days; (3) failure to meet compliance schedule milestones within 90 days; (4) failure to issue/reissue control mechanisms to 90% of SIUs within 6 months; (5) failure to inspect or sample 80% of SIUs within the past 12 months; and (6) failure to enforce standards and reporting requirements.	1

Pretreatment Information on NPDES Permit Application or Notice of Intent (this includes permit application data required for all new and existing POTWs [40 CFR 122.21(j)(6)] [Note: These data will be added or updated through the Annual Pretreatment Program Report, see 40 CFR 403.12(i), as needed. It is also important to note that the 'Associated NPDES ID Number' identifies the receiving POTW's NPDES permit number for each industrial user.]		
Data Name	Data Description	NPDES Data Group Number
Pretreatment Program Required Indicator	The unique code/description that describes whether the permitted municipality is required to develop or implement a pretreatment program (in accordance with 40 CFR 403).	1,2
Pretreatment Program Approval or Modification Date	The date the pretreatment program was approved or substantially modified. This data element can be system generated by carrying forward the most recent date (approval or modification). The date must be provided in YYYY-MM-DD format where YYYY is the year, MM is the month, and DD is the day.	1,2
Pretreatment Program Modification Type	The unique code describing the type of substantial modification to a POTW Pretreatment Program, which includes the initial start of a pretreatment program.	1,2
Industrial User Type	The unique code/description that identifies the type of each industrial user discharging to a POTW [e.g., Significant Industrial User (SIU), Standard Categorical Industrial Users (CIU), Non-Significant Categorical Industrial User (NSCIU), and Middle Tier Categorical Industrial User (MTCIU)]. This data element is at the permit or control mechanism level and is required for each SIU, CIU, NSCIU, and MTCIU. This data element also applies to SIUs and CIUs that discharge non-domestic wastewater by truck, rail, and dedicated pipe or other means of transportation to one or more POTWs.	1,2
Significant Industrial User Subject to Local Limits	The unique code (e.g., "Yes", "No") that identifies for each Significant Industrial User (SIU) or Categorical Industrial User (CIU) discharging to a POTW (including non-domestic wastewater delivered by truck, rail, and dedicated pipe or other means of transportation) whether the SIU is subject to local limits.	1,2



# WHAT DOES THIS MEAN FOR PRETREATMENT?

Pretreatment Information on NPDES Permit Application or Notice of Intent (this includes permit application data required for all new and existing POTWs [40 CFR 122.21(j)(6)] [Note: These data will be added or updated through the Annual Pretreatment Program Report, see 40 CFR 403.12(i), as needed. It is also important to note that the 'Associated NPDES ID Number' identifies the receiving POTW's NPDES permit number for each industrial user.]		
Data Name	Data Description	NPDES Data Group Number
Significant Industrial User Subject to Local Limits More Stringent Than Categorical Standards	The unique code (e.g., "Yes", "No") that identifies for each Categorical Industrial User (CIU) discharging to a POTW (including non-domestic wastewater delivered by truck, rail, and dedicated pipe or other means of transportation) whether the CIU is subject to one or more local limits that are more stringent than the applicable categorical standards.	1,2
Applicable Categorical Standards	This data element will identify for each Categorical Industrial User (CIU) discharging to a POTW (including non-domestic wastewater delivered by truck, rail, and dedicated pipe or other means of transportation) the applicable categorical standard(s) by its 40 CFR part number (e.g., Metal Finishing – part 433, Electrical and Electronic Components – Part 469). This data element will track the one or more applicable categorical standards even when the CIU is subject to one or more local limits that are more stringent than the applicable categorical standards.	1,2
Significant Industrial User Wastewater Flow Rate	This data element will identify for each Significant Industrial User (SIU) or Categorical Industrial User (CIU) that is discharging to a POTW (including non-domestic wastewater delivered by truck, rail, and dedicated pipe or other means of transportation) the estimated maximum monthly average wastewater flow rate (in gallons per day).	1,2
Industrial User Causing Problems at POTW	The unique code/description that identifies for each Significant Industrial User (SIU) or Categorical Industrial User (CIU) whether it caused or contributed to any problems (including upset, bypass, interference, pass-through) at a POTW within the past four and one-half calendar years. EPA regulations require the Control Authority to develop and enforce local limits when the discharge from an IU causes or contributes to any problems (including upset, interference, and bypass) at the receiving POTW's effluent discharge or biosolids/sewage sludge management. This data element also applies to SIUs and CIUs that discharge non-domestic wastewater by truck, rail, and dedicated pipe or other means of transportation to one or more POTWs.	1,2
Receiving RCRA Waste	The unique code/description that identifies whether a POTW has received RCRA hazardous waste by truck, rail, or dedicated pipe within the last three calendar years.	1,2
Receiving Remediation Waste	The unique code/description that identifies whether the POTW has received RCRA or CERCLA waste from off-site remedial activities within the last three calendar years.	1,2
Control Authority Identifier	This data element identifies the one or more Control Authorities for each Significant Industrial User (SIU) or Categorical Industrial User (CIU). When the Control Authority is a POTW this data element will use the POTW's NPDES ID. There will also be a unique identifier for each state and EPA Region for SIUs and CIUs when they are the Control Authority.	1,2



# WHAT DOES THIS MEAN FOR PRETREATMENT?

Compliance Monitoring Activity Information (Discharge Monitoring Report, and Pretreatment Periodic Compliance Reports for Significant Industrial Users (SIUs) and Categorical Industrial Users (CIUs) when EPA or the State is the Control Authority) [Note: Authorized NPDES programs will identify in the applicable NPDES permits whether MS4 regulated entities are required to submit DMRs.]		
Data Name	Data Description	NPDES Data Group Number
Permitted Feature Identifier (Compliance Monitoring Activity)	The unique identifier for the permitted feature number(s) entered by the user for the inspected or monitored permitted feature(s). This data element will use the same number used by 'Permitted Feature Identifier (Permit)' data element for each compliance monitoring activity permitted feature. This will provide a unique link between each compliance monitoring activity permitted feature and the corresponding NPDES permitted feature. This data element can be left blank if the compliance monitoring activity does not involve a permitted feature. For Sewer Overflow/Bypass Event Reports this data element will identify the permitted feature(s), if any, for each Sewer Overflow/Bypass Identifier. The POTW can leave this data element blank on the Sewer Overflow/Bypass Event Report if the sewer overflows are caused by an extreme weather event (e.g., hurricane) that floods the entire sewer system and are too numerous to count. This data element applies to compliance monitoring activities performed by the authorized NPDES program and EPA (e.g., inspections) as well as compliance monitoring reports submitted by the NPDES regulated entity (e.g., DMRs, program reports).	1, 3, 4, 6, 8, and 9
Limit Set Designator (Compliance Monitoring Activity)	The unique identifier tying the compliance monitoring activity (e.g., DMR submission) to the corresponding Limit Set record.	3,6,8
Parameter Code (Compliance Monitoring Activity)	The unique code/description identifying the parameter reported on the compliance monitoring activity (e.g., DMR submission).	3,6,8
Monitoring Location Code (Compliance Monitoring Activity)	The unique code/description that identifies the monitoring location at which the sampling occurred for a compliance monitoring activity parameter (e.g., DMR submission).	3,6,8
Limit Season Number (Compliance Monitoring Activity)	The unique identifier tying the compliance monitoring activity (e.g., DMR submission) to the Limit Season Number of the corresponding limit. This data element is necessary as a parameter can have different seasonal limits within a single limit start and end date.	3,6,8
Monitoring Period End Date (Compliance Monitoring Activity)	The monitoring period end date for the values covered by the compliance monitoring activity (e.g., DMR submission). The date must be provided in YYYY-MM-DD format where YYYY is the year, MM is the month, and DD is the day.	3,6,8



# WHAT DOES THIS MEAN FOR PRETREATMENT?

Compliance Monitoring Activity Information (Discharge Monitoring Report, and Pretreatment Periodic Compliance Reports for Significant Industrial Users (SIUs) and Categorical Industrial Users (CIUs) when EPA or the State is the Control Authority) [Note: Authorized NPDES programs will identify in the applicable NPDES permits will identify whether MS4 regulated entities are required to submit DMRs.]		
Data Name	Data Description	NPDES Data Group Number
No Data Indicator (NODI) (Compliance Monitoring Activity)	The unique code/description that indicates the reason that "No Discharge" or "No Data" was reported on the compliance monitoring activity (e.g., DMR submission) (e.g., B = Below Detection Limit, C = No Discharge).	3,6,8
Value (Compliance Monitoring Activity)	The number value reported on the compliance monitoring activity (e.g., DMR form).	3,6,8
Quantity or Concentration Units (Compliance Monitoring Activity)	The unique code/description that identifies the one or more units of measure that are applicable to quantity or concentration limits and measurements as entered on the compliance monitoring activity (e.g., DMR submission). This field is optional if the units are the same as the limit units.	3,6,8
Value Received Date (Compliance Monitoring Activity)	The date the compliance monitoring value was received by the regulatory authority (e.g., DMR submission). The date must be provided in YYYY-MM-DD format where YYYY is the year, MM is the month, and DD is the day.	1
Value Type (Compliance Monitoring Activity)	The unique code/description identifying a value type (e.g., Quantity 1, Quantity 2, Concentration 1, Concentration 2, Concentration 3) on a compliance monitoring activity (e.g., DMR submission).	3,6,8
Value Qualifier (Compliance Monitoring Activity)	The unique code identifying the qualifier for the reported value (e.g., "<", "=", ">") on a compliance monitoring activity (e.g., DMR submission). This field is optional if the qualifier is "=".	3,6,8



# IMPLICATIONS FOR CONTROL AUTHORITY ANNUAL REPORTS

- Overall descriptive/permit status information on each SIU will need to be electronically filed.
- Overall compliance data on each SIU will need to be electronically filed.
- Data relating to SNC for a SIU (e.g. specific limits, reporting, etc.) will need to be electronically filed.
- Enforcement Action details will need to be electronically filed.



## IMPLICATIONS FOR SIU REPORTING

- For SIUs in approved programs, no change – unless the CA requires them to electronically file their periodic report.
- For SIUs not in approved programs, periodic reporting data will need to be filed electronically.
- EPA and/or CA will need to train SIUs in non-approved programs in the use of electronic reporting interface.

