



Annual Reporting Overview/Lessons Learned

E-Rule – 40 CFR Part 127

- POTWs with an approved pretreatment program
40 CFR 403.12(i)
- Pretreatment annual reports to the Approval Authority documenting program status and activities performed during the previous year.
- SIUs & CIUs with State/EPA as Control Authority
40 CFR 403.12(e) & (h)
- SIU/CIUs must submit a report on their compliance status at least semiannually (once every 6 months).

NET PPR Onboarding Schedule

➡ CY 2024

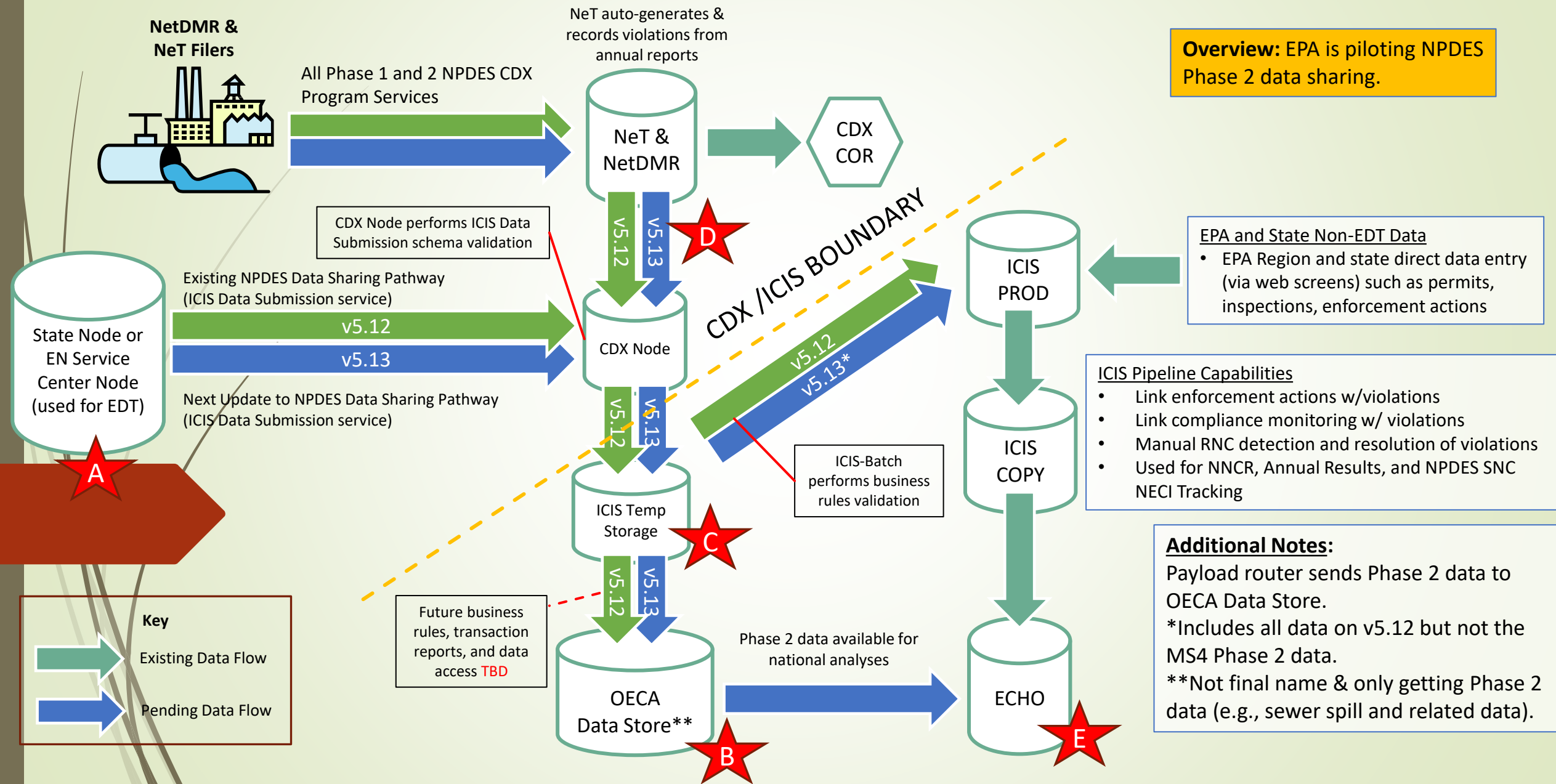
- Region 1
(MA, NH)

CY 2025: Starting Jan 1, 2026

- Maine
- Rhode Island

➡ Vermont and Connecticut are 403.10(e) States and do NOT submit POTW annual reports

NPDES eReporting Phase 1 & 2 Data Submissions





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NET PPR Violations

R001P – Failure to enforce against pass through and/or interference

R002P – Failure to submit required report within 30 days of applicable due date

R003P – Failure to issue/reissue control mechanisms to at least 90% of SIU/CIUs within 6 months of Significant Industrial User control mechanism expiration

R004P – Failure to inspect at least 80% of SIU/CIUs within the past 12month reporting period

R005P – Failure to sample at least 80% of SIU/CIUs within the past 12month reporting period

R006P – Failure to enforce pretreatment standards, approved local limits, and reporting requirements (more than 15% of Significant Industrial Users in SNC)

R007P – Failure of the Control Authority to publish for SNC



<https://cdx.epa.gov/>

Test/“Sandbox” site

<https://test.epacdx.net/>



BE CAREFUL (here is an example)

- 40 C.F.R. § 403.8(f)(1)(iii)(B)(1)
 - *Statement of duration (in no case more than five years)*
- Examples of permit duration more than 5 years
 - Permit effective date – 11/21/2024
 - Permit expiration date – 11/21/2029
 - Permit duration – 5 years and 1 day

Make note of the **first available date**
to enter data.....

- **Annual Report Start Year:** 2024
- **First Day of Reporting Period:** January 1
- **Last Day of Reporting Period:** December 31
- **Report First Available Date:** January 1, 2025
- **Annual Report Due Date:** March 1, 2025

Wish List Revisions for next year – Work in progress

- Adding Aluminum to the local limit table
- Adding the approval/modification date for Sewer Use Ordinance/Enforcement Response Plan
- Special section on PFAS data. There will be a question on whether or not you have PFAS requirements in your NPDES permit. If you do there will be a separate area to add in that data. Currently you should put that under the “Any Additional Information” Section in last section.
- Adding in a zero “0” if no samples were actually performed if your facility is not required to test for that particular parameter.

Issues

- ➡ Permit expires next year but the system thinks its 3 months past now. POTW cannot extend it past 6/25/21 without going over 5 years. We sent this info to the admin of NETPPR and thy responded that they didn't see a problem.
NO THIS IS A PROBLEM!!!!

Issues - Negative months when permit is still effective

NPDES ID: NHPIU004Q	SIU/CIU Name: Masimo Semiconductor, Inc.	IU Type: CIU
Control Mechanism No.: 870160.1220		
Permit Type: Individual	Average Daily Process Wastewater Flow Rate (gpd): 4100	
Permit Effective Date: 07/01/2023	Average Daily Facility Wastewater Flow Rate (gpd): 5100	
Permit Expiration Date: 06/30/2025	Zero Discharge? No	
Permit Termination Date:	Was There a Substantial Change to IU's Discharge? No	
Permit Issuing Organization: Local	Submitted Notification of Changed Discharge? N/A	
Jurisdiction: Hudson, NH	CIU Categorical Pretreatment Standard Citation: 40 CFR 469.18 & 469.28	
Permit Status as of End of Reporting Period: Effective	Subject to Local Limits? Yes	
Months Left Until Permit Expiration Date: -5	Are the Local Limits More Stringent Than Categorical Standards? Yes	

POTW Monitoring

- I think it would help that it would say enter a zero 0 if no samples were actually performed and then enter E in the annual data box. If your faculty is not required to test for this.

Things POTWs need to change...

- Influent/Effluent/Sludge reports are being sent in as pdf rather than the excel spreadsheet required format
- NEED TO FOLLOW THE TEMPLATE

Boilerplate Template

Location:	Influent				
Units:	mg/L				
Period:	01/01/2024 - 12/31/2024				
		Date	Date	Date	Date
	Pollutant				
	Arsenic, total [as As]				
	Cadmium, total [as Cd]				
	Chromium, hexavalent [as Cr]				
	Chromium, total [as Cr]				
	Chromium, trivalent [as Cr]				
	Copper, total [as Cu]				
	Cyanide, free [amenable to chlorination]				
	Cyanide, total [as CN]				
	Iron, total [as Fe]				
	Lead, total [as Pb]				
	Mercury, total [as Hg]				
	Molybdenum, total [as Mo]				
	Nickel, total [as Ni]				
	Selenium, total [as Se]				
	Silver, total [as Ag]				
	Thallium, total [as Tl]				
	Zinc, total [as Zn]				
	BOD, 5-day [20 deg. C]				
	Nitrogen, ammonia, total [as NH3]				
	Suspended Solids, Total				

POTW Example

Date Sampled	Analyte	Influent	Effluent	Sludge
10/17/2024	Aluminum	210	35	1700
10/17/2024	Arsenic	<1.0	<1.0	<11
10/17/2024	Cadmium	<1.0	<1.0	<3.7
10/17/2024	Chromium	18	4.2	120
10/17/2024	Copper	91	7.7	480
10/17/2024	Lead	2.7	<0.60	31
10/17/2024	Nickel	260	64	41
10/17/2024	Silver	<1.0	<1.0	
10/17/2024	Zinc	50	<16	320
10/17/2024	Mercury	<0.00020 mg/L	<0.00020 mg/L	0.32
10/17/2024	Cyanide	<0.010 mg/L	0.029 mg/L	

Issues ...BE CAREFUL

- Failure to enforce pretreatment standards, approved local limits, and reporting requirements for 85% or more of permitted SIUs/CIUs in SNC during the reporting period.

Failure to enforce issues

Violations Generated From the Pretreatment Program Report

Below is a list of pretreatment violation codes that were generated from the information reported on a certified annual report. These codes start with "R" and end with "P." Click [here](#) to view more information about pretreatment violation codes. Click on + to expand the filter section and select one or more filtering options to customize the list of violations displayed.

Number of Violations Generated: 1

Violation Code: R001P

Violation Level: Level I

Violation Description: Failure to enforce against pass through and/or interference during the reporting period.

Business Rules to Determine Violation: Failure of the Control Authority to take a formal enforcement action within the reporting period against an IU (i.e. SIU, CIU, Non-SIU) that caused pass through and/or interference. This violation code will be generated when the reason for SNC for at least one IU was due to violation of a pretreatment standard that caused Interference or Pass Through and no formal enforcement action was initiated.

Violation Details:

- **IU in SNC that caused interference or pass through without a formal enforcement action being initiated:** Yes

Violation Calculation:

- **In SNC:** Yes
- **Reason for SNC:** Any other violation of a pretreatment standard or requirement as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW determines has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the general public)
- **Was a Formal Enforcement Action issued for this violation?:** No

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Number of Violations Generated: 1

Violation Code: R002P Violation Level: Level I

Violation Description: **Failure to submit required report within 30 days of due date.**

Business Rules to Determine Violation: The Control Authority is required to submit the Pretreatment Program Report on a regular schedule (at least annually). A violation code will be generated when the Pretreatment Program Report is submitted after 30 days of applicable due date.

Violation Details:

Days Lapsed After Due Date > 30 Days: Yes

Violation Calculation:

Annual Report Due Date: 03/01/2025

Certified/Submitted Date: 04/01/2025

Days Lapsed After Due Date: 31