

**Michigan Department of Natural Resources and Environment  
Electronic Discharge Monitoring Reporting System  
Frequently Asked Questions (FAQs)**

This FAQ sheet has been developed to assist users of the State of Michigan's electronic Discharge Monitoring Report (eDMR) system. If you do not find the answers you need here, please contact your District compliance staff. The list of questions below is hyperlinked to the question and response below (control-click to jump to the question and answer listed). These FAQs were last updated 10/08/10.

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## Submitting eDMRs

### 1. When are my electronic Discharge Monitoring Reports (eDMRs) due?

Under Part II.C.2 of your National Pollutant Discharge Elimination System (NPDES) permit, eDMRs are required to be submitted by the 20<sup>th</sup> of the month following the month when discharges were authorized. For example, the eDMR for February 2010 is due March 20, 2010.

### 2. How do I know if the eDMR system has received and accepted my submittal?

You will receive an "Upload Successful" message in red on the submittal screen along with a confirmation number. If you receive a message on your screen indicating that an eDMR has not been accepted, your eDMR has not been received or submitted to the eDMR system. Note that Daily and Monthly eDMR forms must each be submitted separately.

Once you submit a Daily or Monthly eDMR, you should also receive two emails for each submittal: one that acknowledges that the submission was received and another that it was accepted or rejected. We recommend that you keep a copy of these emails or, at a minimum, record the confirmation number.

You may also check to see the status of an eDMR by clicking on the "View Reports" icon (on the left of the eDMR screen). There are three query tabs in this area: "Validated Reports" (these have been accepted), "Submitted Reports" (these have been submitted but not accepted), and "Unsubmitted Reports" (these have neither been submitted nor accepted).

### 3. The eDMR system keeps rejecting my submittal. What do I do?

Please look for these common formatting mistakes:

- Inserting a space between the less than sign and the numerical value (e.g. "< 1.0" rather than "<1.0")
- Using the less than sign (<) on a Monthly DMR
- Using a code letter without the asterisk (e.g. "G" instead of "\*G")
- Reporting "ND" or "NA" instead of a numerical value or non-numeric code (see question 15 below)
- Entering "y" or "n" instead of "yes" or "no"
- Using commas
- Inserting double decimal points
- Inserting a space between the asterisk (\*) and the letter for non-numeric codes
- Reporting the unit in the same field as the value

If your eDMR is still not accepted after you double-check these items, please contact your District staff person.

4. **If I submit either the Daily eDMR or Monthly eDMR, will the other eDMR be automatically submitted?**

No. You must submit the Daily and Monthly eDMRs separately.

### **Saving eDMRs**

5. **I am sometimes having problems saving data to my eDMR forms. What is happening?**

It may be that your connection to the server has timed out, after which point you will not be able to save your eDMR. To avoid this problem, please save your data at least every 5 minutes to keep your connection active.

### **Errors in eDMR Forms**

6. **I have a newly reissued permit that has just gone into effect. When I pull up the eDMR form for this month, however, the new limits/parameters are not listed. What should I do?**

It takes some time for new limits to get established in the eDMR system. In the case of permit reissuance (or modification) where new limitations or monitoring are required, you will need to wait until just a few days prior to the 20<sup>th</sup> of the month after the permit goes into effect (i.e. the date that your eDMR is due) before opening the eDMR forms.

Once you open an eDMR form, an instance of it is saved in the eDMR system whether or not you modified or saved the form. The system is designed to pull the current parameters and limitations at the time the eDMR is opened. If you open an eDMR form prior to the limits being updated, the eDMR will not reflect the new limitations and/or parameters. Furthermore, once an instance of an eDMR form has been created with a certain set of limits, the form will not subsequently change (i.e. it is not dynamically generated each time).

If you have opened an eDMR form prior to the time that the limits/parameters are updated (and the form is not reflecting the appropriate monitoring requirements), the eDMR form will need to be deleted by the eDMR administrator, Jeffrey Jones, who may be contacted at (517) 335-4125. Please confirm with him when the parameters and limitations will be updated and therefore when you may open your eDMRs.

This situation may happen with a permit reissuance (once every five years) or upon permit modification. We apologize for the inconvenience.

**7. Our permit limitations change or go into affect next month. When I pull up the eDMR form for next month, however, the new limits/parameters are not listed. What should I do?**

Once you open an eDMR form, it is saved in the eDMR system whether or not you modified or saved the form. The system is designed to pull the current parameters and limitations at the time the eDMR is opened. If you open an eDMR prior to the month that the limitations go into effect, the eDMR will not reflect the new limits and/or parameters. For most limitation changes, you must wait until the effective date of the effluent limitations prior to opening an eDMR.

If you have opened an eDMR form prior to the month that the permit limitations go into effect (and the form is not reflecting the appropriate monitoring requirements), the eDMR form will need to be deleted by the eDMR administrator, Jeffrey Jones, who may be contacted at (517) 335-4125. You will then need to wait until the month that the permit limitations go into affect before you open the eDMR.

This situation may happen when you have monitoring frequency or limitation changes such as reductions or time-delayed effluent limits (such as for mercury). We apologize for the inconvenience.

**8. Some parameters/permit limits/monitoring points are incorrect on the eDMR form(s) in eDMR. What should I do?**

See questions 6 and 7 above. If those conditions do not apply, please contact your District staff person or Jeffrey Jones at (517) 335-4125 for assistance.

### **Entering Data into eDMRs**

**9. How should less than detectable results be recorded on my eDMR?**

Input less than the reporting level (e.g. "<1.0") for less than detect values on the Daily eDMR. (Note that there should be no space inserted between the "<" sign and the numerical value, e.g. it should read as "<1.0"). To calculate loadings on the Daily eDMR using less than detectable concentrations, multiply the detection level concentration in mg/l by the daily flow in MGD and 8.34 to report the resulting less than detection loading in lbs/day. Generally, zeroes should not be used on the Daily eDMR form. For example, a pollutant concentration of 10 mg/l with a flow of 1 MGD is reported as 83 lbs/day. If monitoring shows a non-detectable result at <10 mg/l at 1 MGD flow, "<83" lbs/day should be reported on the Daily DMR as the loading.

The Monthly eDMR form will not accept data using the less than sign. Zeros may therefore be used on the Monthly eDMR form if appropriate. For example, a facility monitors once monthly for low-level mercury and receives a non-detectable result of <0.5 ng/l. The facility would report "<0.5" on the Daily eDMR and "0" on the Monthly eDMR.

## 10. How do I calculate 7-day averages?

The 7-day average is derived by taking the average of the samples collected in any 7-day period during discharge. Days with no discharge shall not be used to determine the value. During discharge, a rolling 7-day period is used to calculate 7-day averages.

Continuous Dischargers:

- With the exception of geometric means, calculate the 7-day averages by adding the available data within each 7-day period and dividing it by the number of data points.
- For example, a facility discharges every day, but monitors 5 days each week. For one 7-day period, their total suspended solids would be calculated as follows (before rounding):

$$\frac{(37.5\text{mg/l} + 46\text{mg/l} + 48.5\text{mg/l} + 76\text{mg/l} + 40\text{mg/l})}{5 \text{ data points}} = 49.6\text{mg/l} \text{ 7-day avg}$$

- For 7-day average geometric means, calculate the geometric mean for the data points included in each of the 7-day periods (see instructions below for calculating a geometric mean).

Intermittent/Seasonal Dischargers:

- For example, a facility discharges for 11 days and has six data points
- Since the days before the first day of discharge and days following the last day of discharge are not to be included, there are five 7-day periods to consider.
- With the exception of geometric means, calculate the 7-day averages by adding the available data within each 7-day period and dividing it by the number of data points (see example above for Continuous Dischargers).
- For 7-day average geometric means, calculate the geometric mean for the data points included in each of the 7-day periods (see instructions below for calculating a geometric mean).

District staff can provide more assistance if these examples are not helpful.

## 11. How do I calculate geometric means?

A. A spreadsheet is available that will make this calculation for you. It can be found at: [http://michigan.gov/deq/0,1607,7-135-3313\\_44117-169862--,00.html](http://michigan.gov/deq/0,1607,7-135-3313_44117-169862--,00.html). Commonly available spreadsheets can also calculate geometric means. District staff can provide more assistance if the following example is not helpful.

*Geometric Means for two or more numbers: Fecal coliform numbers need to be summarized as geometric means, not as simple averages. As an example, assume 7 days of discharge, with the following data:*

*0, 150, 34, 4, 533, 8, and 2*

*First of all, the “0” becomes a “1”. Then take the logarithms of all numbers and sum them up:*

$$= \log 1 + \log 150 + \log 34 + \log 4 + \log 533 + \log 8 + \log 2$$

$$= 0.0000 + 2.1761 + 1.5315 + 0.6021 + 2.7267 + 0.9031 + 0.3010 = 8.2405$$

*The average of this sum is  $8.2405 / 7 = 1.1772$ .*

*Use the  $10^x$  key to calculate Geometric Mean =  $10^{1.1772} = 15$*

**12. How do I calculate monthly averages with less than detectable values?**

Less than detectable values are generally considered zero for the purposes of calculating monthly and 7-day averages. Since zeros may not be used to calculate geometric means, please use the detection level in that case (e.g. use “1” in your calculations when the results are “<1 ct/100 ml.” For specific guidance on calculating geometric means and reporting fecal counts, please see p. 231-1 of the *2010 DNRE Laboratory Manual*, which is available online at michigan.gov at [http://www.michigan.gov/documents/deq/deq-ess-otu-ww-LABMANUAL\\_257633\\_7.pdf](http://www.michigan.gov/documents/deq/deq-ess-otu-ww-LABMANUAL_257633_7.pdf).

**13. We did not discharge at all this month. How do I fill out our eDMRs?**

Check the “NO DISCHARGE FROM SITE” box on the upper right-hand corner of the Monthly eDMR and submit the eDMR as usual. The Daily eDMR does not need to be submitted for months with no discharge.

**14. We do not monitor every day. What should I put on our Daily eDMR in the cells for the days that we do not monitor?**

Nothing—leave them blank. Do not insert zeros, which would imply that monitoring was conducted with a result of zero (or non-detect).

**15. We forgot to monitor for a pollutant or we sampled but had a laboratory problem and failed get a valid result. How do I fill out the eDMR?**

Please insert the appropriate non-numeric code on the Daily and/or Monthly eDMR. For example, the code “\*H” (meaning “did not sample as required by permit”) is appropriate for use on either the Daily or Monthly eDMR form. The Monthly eDMR has other choices that may be appropriate. You must scroll down to the bottom of the eDMR form screen to view your choices. You may use the comment features of the eDMR system to describe the situation in more detail. See Question 15 for a discussion of non-numeric codes. If you have questions about code use, contact your District staff person.

**16. Our fecal count was too numerous to count (TNTC). What do I record on the Daily eDMR?**

The code “\*Y” is available to record TNTC. However, reporting a number based on your results is likely more appropriate. For guidance on calculating and reporting fecal counts, please see p. 231-1 of the *2010 DNRE Laboratory Manual*, which is available online at michigan.gov at [http://www.michigan.gov/documents/deq/deq-ess-otu-ww-LABMANUAL\\_257633\\_7.pdf](http://www.michigan.gov/documents/deq/deq-ess-otu-ww-LABMANUAL_257633_7.pdf).

**17. What are the non-numeric codes and how do I use them?**

Codes may be used when numbers are not appropriate. You may scroll down to the bottom of the screen to view your choices; note that some codes are appropriate for the Monthly but not the Daily eDMRs and vice versa. The following is a summary of the non-numeric codes. Please be sure to use the asterisk when using the codes, with no space between the asterisk and the letter.

<b>Code</b>	<b>Description</b>
*A	Sampling Equipment Failure
*B	Insufficient Flow for Sampling
*C	Laboratory Problem/Error
*D	Laboratory Results Not Received in Time for Report
*E	This Effluent Limit Not Applicable in this Reporting Period
*F	Not in Operation during this Reporting Period
*G	Not Required this Reporting Period/Monitoring is Conditional
*H	Did not sample as required by permit
*T	Alternative to TTO Monitoring
*W	Toxicity Test no Conducted for this Species this Reporting Period
*Y	Fecal Coliform too numerous to count

**18. How many decimal places should I report? Should I round data?**

Please note that regardless of the following discussion, the quality of your data must demonstrate compliance with permit limitations. Except in special cases, laboratory reporting levels (also called quantification levels) must be sufficiently lower than permit limits to show compliance. See your permit for any specific quantification level requirements.

The DNRE policy states that the number of significant figures reported should be consistent with permit limits, which are generally expressed with no more than two significant digits. When the permit limit is expressed as a single significant figure, results should be reported as one significant figure or reported as two significant figures when the result is a higher magnitude (and the analysis supports that level of accuracy). For example, an analytical result of 4.3 should be reported as 4 (one significant figure) for a permit limit of 5. If the result were 12, it should be reported as 12 (two significant figures) if supported by the analysis.

Data should be appropriately rounded to report the correct number of significant figures. Note that all calculations (e.g. averaging and multiplying) should be completed before any rounding takes place. In general, if the digit being dropped is from 0 to 4, the preceding number should be left as is. If the digit being dropped is from 6 to 9, the preceding number should be increased by 1. If a 5 is dropped, the preceding digit should be rounded to the nearest even number (4.25 becomes 4.2; 4.35 becomes 4.4).

For a more detailed discussion of rules for significant figures, rounding, and precision, the document “Water Bureau Policy and Procedure WB-015, Significant Figures” is available. Please contact your District staff person to discuss any issues and obtain a copy if needed.

**19. What are stage codes and how are they used?**

Stage codes are used to describe the parameter or its monitoring locations and are listed in the left-hand column of the Monthly eDMR along with the parameter and in the fourth header row of the Daily eDMR. You should not input these codes into the eDMR. The codes are listed on the eDMR form to help describe sample locations when the same parameter may be monitored at more than one location. For example, at a groundwater cleanup benzene may be monitored in the influent (stage code G), intermediate (stage code R), and effluent (stage code 1). Stage codes may also describe calculated data. Commonly used stage codes are listed below:

Stage Code	Code Description
#	Cumulative
1	Final Effluent
B	Prior to Disinfection
G	Influent
K	Percent Removal
R	Intermediate

Please be sure to enter the correct data for each monitoring location or calculation as defined by the stage code.

**20. Should I leave blanks on our Monthly eDMR form?**

No, do not leave blank cells on your Monthly eDMR unless there was no discharge all month. If your facility had no discharge, please see question 11. If you had a discharge and you leave cells blank, you will incur non-reporting violations.

Otherwise, please enter data values or non-numeric codes, as appropriate, in all data entry cells on the Monthly eDMR. You may also add explanatory comments. See question 15 for a discussion of non-numeric codes. For example, if sampling was not required that month for a particular parameter, insert “\*G” on the Monthly eDMR. Note that leaving blank spaces on Daily eDMRs is acceptable.

**21. Should I leave blank cells on our Daily eDMR form?**

Yes, you may leave blanks on your Daily eDMR form if appropriate. Entire rows may be blank for days when samples were not collected. Individual cells may be blank when a sample for a specific parameter was not collected that day. Note that use of some non-numeric codes may be appropriate (see question 15).

**22. How do I determine the number of exceedances (for daily maximum/minimum, 7-day average, and 30-day averages)?**

- For daily maximum or minimum limits, the number of exceedances equals the number of days that the permit limits were exceeded that month.
- For 7-day averages, the number of exceedances equals the number of consecutive 7-day periods when the 7-day average permit limits were exceeded. Note that consecutive 7-day periods may overlap. For general permit lagoons, note that the 7-day averages should be calculated during the discharge periods only (not including days before or after).
- For 30-day averages, only one exceedance may occur in a month for each permit limitation. Note that load limits and concentration limits should be considered as separate limits.

**23. I conducted additional monitoring this month for a parameter that is only required to be monitored quarterly. I am required to report this monitoring under Part II.C.4. of my permit, but the pollutant in question is not listed in our eDMR this month. How should I report this additional monitoring?**

You may report the additional monitoring as a general report comment on the Monthly eDMR if there is no column on the Daily eDMR or row on the Monthly eDMR for that parameter. Include the date of sampling and result(s).

**24. Can I copy and paste data to an eDMR form from an Excel spreadsheet?**

Yes. Please see the Facility User's Guide, pages 46-55, for detailed instructions. Click [here](#) to open the Guide.

## Reporting Violations

- 25. If I have a violation (e.g. failed to sample, effluent violation) that I report on my eDMR, what else needs to be done?**

Be sure to include a general report comment. If the violation was an “average” effluent violation, the general comment is generally sufficient. If the violation was a daily maximum or minimum, immediately contact your DNRE staff person and follow-up with a written report as required in Part II.C.6 of your permit. The contact and report should be made as soon as you become aware of the violation, not when you are compiling your monthly report.

## Correcting eDMRs

- 26. How do I correct or update an eDMR that has already been submitted?**

In the eDMR system, go to the “Reporting Requirements and Forms” section and click on the “Data Entry” hyperlink under “Online Entry” for the month and form (i.e. Daily or Monthly) that you want to resubmit. Note that Daily and Monthly eDMR forms are each shown on their own tab. The form submitted should appear (populated with the data that you’ve already entered). You may make changes and comments and resubmit the form using the “Save and Submit DMR” button. Be sure that you receive your confirmation emails as discussed in question 2 above.

- 27. If I revise the Daily or Monthly e2-DMR after the 20<sup>th</sup> of the month, will DNRE consider the submission a “late reporting” violation?**

No, resubmittals of eDMRs after the due date are not considered late reporting in and of themselves. If data was omitted from the first eDMR submitted, those specific data omissions would be considered non-reporting violations.

## Record-keeping

- 28. Am I required to print a hard copy or save an electronic copy of our submittals?**

Yes, either a hard copy or an electronic copy must be saved. Per Part II.B.5. of your NPDES permit, it is required that all records be retained by the facility for a minimum of three years. Further, these records must be available for inspection under Part II.D.9. of your permit. In addition, it is always wise to save either an electronic copy (with backup in a safe location) and/or a hard copy of your eDMR submittal in case of eDMR system failure.

## MORs and eDMRs

- 29. What is the difference between MORs and eDMRs?**

Monthly operating reports or MORs include monitoring data used to determine the proper operation of a treatment system that serves the public, and do not apply to industrial facilities or storm water facilities. Data gathered may include influent, primary effluent, secondary effluent, etc. and may include parameters and/or calculations not specified on the facility's effluent limits page of its NPDES permit such as mixed liquor suspended solids (MLSS). This information is required to be gathered for treatment systems that serve the public under Part 41, Sewerage Systems, of the Natural Resources and Environmental Protection Act, 1994 PA 451 (NREPA). As permits are being reissued for these facilities, their MOR forms will be evaluated and retained self-monitoring granted if appropriate.

For most facilities, eDMRs are required to be submitted on a monthly basis through the eDMR system and include data from monitoring conducted to meet the requirements of Part I.A. of your NPDES permit, which is issued under Part 31, Water Resources Protection, of the NREPA. The eDMRs primarily focus on effluent quality; exceptions include permits for 2-stage granular activated carbon (GAC) treatment, which may include influent and intermediate monitoring requirements.