



FAQ

# Discharge Monitoring Reporting (DMR) in MiWaters Frequently Asked Questions (FAQ)

The Michigan Department of Environmental Quality (DEQ), Water Resources Division (WRD) has developed this FAQ sheet to assist users of the State of Michigan's Discharge Monitoring Report (DMR) in MiWaters. 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 November 29, 2016.

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### **Due Dates**

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

Under Part II.C.2 of your National Pollutant Discharge Elimination System (NPDES) permit, DMRs are required to be submitted by the 20th of the month following the month when discharges were authorized. For example, the DMR for February 2016 is due March 20, 2016. You will receive notifications in MiWaters (and via email if you choose that option in your user profile) to remind you when DMRs are due.

## Using DMRs

#### 2. I don't like how my DMR looks on the MiWaters Web site. It is difficult to Navigate.

There is MiWaters training available through the MiWaters Web site at www.Michigan.gov/MiEnviro. In addition, here are some quick tips on how to customize your view:

- Once you open up your DMR, you may reduce the left-hand navigation menu by clicking on the green arrow on the upper left-hand side of your screen. This will provide more viewing space. Click on the arrow again to expand the navigation menu.
- The DMR is divided by Monitoring Point, which is navigated by a drop-down box, and two tabs (Daily and Summary) for each Monitoring Point.
- Daily tabs have pages, which are displayed in buttons above and to the right of the parameter row. You can navigate between pages by clicking on either the page numbers or the first, last, previous, or next buttons.
- The columns on the daily tabs may be compressed to show more columns per page. This can be done by moving the slider bar that is located above and to the left of the parameter row. If you move the slider bar all the way to the right, all the columns will be on one page. Your page may now exceed your view, but you will be able to see columns to the right by using the slider bar at the bottom of your screen.

# **3.** *My DMR looks different. It has duplicate columns for parameters like TSS, fecal coliform, and pH. Is this an error?*

It may not be an error. DMRs are now capturing and listing additional information. The first row of the header lists the parameter and the second the stage code, followed by a code in parentheses (a number, letter or symbol). The third row of the header lists the "Limit" associated with the data (this is new) or states "Report" and the unit of measure. The fourth row from the top of the form is "Stat Base" (short for *statistical base*) and describes the type of data you should provide in that column.

- The old forms asked for daily data, but did not have a place to record 7-day averages (although calculation of 7-day averages was required and one value reported on the Monthly/Summary sheet). The current DMR Daily tab requires you to report 7-day average calculations in the Stat Base column "Maximum 7-day Average." Data for this column should be calculated and reported starting on the 7<sup>th</sup> day of discharge or discharge event (see more detailed discussion of calculating 7-day averages in question 5).
- The pH columns are for reporting the maximum and minimum results recorded for that day. A second column was added to aid in reporting if multiple pH samples were taken in one day. If only one pH reading is taken per day, record the same result in the Minimum Daily and Maximum Daily columns.
- The Maximum Daily columns that state "Report" in the "Limit" row of the header are for reporting daily monitoring results associated with parameters that have 7-day average or monthly limits. Providing this required data on the Daily tab provides valuable, detailed information to the DEQ on when and how often samples were taken.
- There may be two Maximum Daily columns for the same parameters when both loading and concentrations of that parameter are limited. The "Limit" row will indicate the associated unit of measure, e.g. lbs/day, mg/l, etc.
- Groundwater discharge facilities now have both daily and summary tabs to complete.

- For some permittees, the "Maximum Daily" column for ammonia nitrogen loading is missing but there is a "Max 7-day Average" column. This issue is due to the structure of the permit and will be resolved upon permit reissuance. Permittees should report their 7-day average loading data as requested in the form. Reporting daily loading calculations is not required in these cases since there is no column for recording this data.
- Prior to the rollout of MiWaters, additional data reporting requirements were put into place for low level mercury reporting. There are now five columns of data to report, per federal requirements: Total Mercury (adjusted data, if appropriate), Total Mercury-uncorrected, Total Mercury-field duplicate, Total Mercury-field blank, and Total Mercury-laboratory method blank. For more information about low level mercury reporting, see the following sources:
  - Recorded webinar on low-level mercury reporting. (The link provided was broken and has been removed)
  - o DEQ Laboratory Guidance on low-level mercury reporting.

If you see differences in your DMR that are not explained above, please contact your District compliance staff to discuss.

## **Entering Data into DMRs**

### 4. How should less than detectable results be recorded on my DMR?

Zeroes should not be used on DMR forms on either the Daily or Summary tabs, except for specific limited conditions such as whole effluent toxicity reporting. Input less than the numeric reporting level (e.g. "<1.0") for less than detect values. Note that there should be no space inserted between the "<" sign and the numerical value. Less than detectable values are generally considered zero for the purposes of calculating monthly and 7-day averages.

To calculate loadings using less than detectable concentrations, multiply the detection level concentration in mg/I by the daily flow in MGD and 8.34 to report the resulting less than detection loading in lbs/day. For example, a pollutant concentration of 10 mg/I with a flow of 1 MGD is reported as 83 lbs/day. If monitoring shows a non-detectable result at <10 mg/I at 1 MGD flow, "<83" lbs/day should be reported on the DMR as the loading.

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

The 7-day average is derived by taking the average of the samples collected in any consecutive 7-day period in a reporting month for continuous dischargers and during a discharge event for intermittent/seasonal dischargers (e.g. lagoon systems). Values from days with no discharge (or when no monitoring is conducted) shall not be used to determine the average. During discharge, a rolling 7-day period is used to calculate 7-day averages in the following manner:

#### **Continuous Dischargers:**

- 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):

(37.5mg/l + 46mg/l + 48.5mg/l + 76mg/l + 40mg/l) = 49.6 mg/l 7-day average

• 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:

- 7-day averages for intermittent/seasonal dischargers are calculated within discharge events only. For example, a facility discharges for 10 days during a discharge event and has six data points. Since the days before the first day of discharge and days following the last day of the discharge event are not included, there are four 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 the example above for Continuous Dischargers).
- For 7-day average geometric means, calculate the geometric mean (see the instructions below for calculating a geometric mean) for the data points included in each of the 7-day periods within each discharge event.
- Report 7-day averages starting on the 7th day of the discharge event and continuing through the last day of the discharge. Discharge events that are less than seven days will report only one 7-day average on the last day of the event.
- For discharges than span two months, please report as follows:
  - For discharge events of 7 days or less, report 7-day averages on the last day of discharge.
  - For discharges of more than 7 days, report 7-day averages starting on the 7th day of discharge and continuing through the last day of discharge.

District staff can provide more assistance if needed.

#### 6. How do I calculate geometric means?

A monthly operating report spreadsheet that will make this calculation for you is available online. Commonly available spreadsheets and online resources may also calculate geometric means, such as the Horton geometric mean calculator (www.graftacs.com/geomean.php3). Please make sure the calculator that you are using is correct; the DEQ WRD does not endorse any specific online resource. District staff can provide more assistance if needed.

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:

<1, 150, 34, 4, 533, 8, and 2

First of all, the "<1" 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 =  $10^{1.1772} = 15$ 

# 7. How do I use less than detectable values to calculate monthly averages associate with geometric means?

Less than detectable values are generally considered zero for the purposes of calculating monthly and 7day 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 <u>DEQ Laboratory Manual</u>. Note that since this is a 2010 manual, there may be some updates needed to some of the methods described.

#### 8. We did not discharge this month. How do I fill out our DMRs?

Check the "No Discharge" box on the upper left-hand corner of the Summary and Daily tabs, certify, and submit.

# 9. We are not required to monitor every day. What should I put on our Daily DMR 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).

# 10. 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 DMR?

Please insert the appropriate non-numeric code on the Daily and/or Summary tab. For example, the code \*H (meaning "did not sample as required by permit") is appropriate for use on either the Daily or Summary tab. The \*H code should be added for each *parameter* and *monitoring period* missed—i.e. insert \*H for each day of discharge when you missed required daily monitoring, on the last day of the week for required weekly monitoring, and on the last day of the calendar month for required monthly monitoring. When a sample was taken but there was a laboratory problem (e.g. a failure in the analysis process, accidently discarded sample, etc.), it may be appropriate to select \*C for "Laboratory Problem/Error." See questions 11 and 12 for special instructions for estimating fecal coliform and carbonaceous/biochemical oxygen demand.

The Summary tab has other choices that may be appropriate. To view your non-numeric code choices, insert an asterisk or \* symbol in the appropriate cell and a list of available codes will appear to the right of your screen. You must then insert a comment to the right of the non-numeric code in the comments box. Click on the comment symbol/balloon and a comment box will appear. Click inside the box to type your comments. See Question 13 for a discussion of non-numeric codes. If you have questions about code use, contact your District compliance staff person.

#### 11. Our fecal count was too numerous to count (TNTC). What do I record on the Daily DMR?

The non-numeric code \*Y is no longer available to record TNTC results. If colonies on all membranes are too numerous to count, use the upper limit count with the smallest filtration volume to calculate the result.

#### Example:

Assume that dilution volumes of 1, 10, and 100 mL all resulted in TNTC.

Use the upper acceptable count for the method (60 colonies in this example) as the basis of calculation with the smallest filtration volume and estimate the count as:

(60 counts/1 mL dilution) X 100 = 6000 counts/100 mL

Record as "TNTC" on the laboratory bench sheet. Report as ">6000 counts/100 mL" (greater than 6000 counts/100 mL) on the Daily tab of the DMR in the "Maximum Daily" column and use 6000 counts/100 mL in calculating the 7-day and monthly geometric means on the Summary tab.

For specific guidance on calculating geometric means and reporting fecal counts, please see p. 233-1 of the 2010 DEQ Laboratory Manual.

# 12. Our CBOD5 or BOD5 results did not meet the requirements of the method of analysis. How should we report it on our DMR?

You should follow the reporting methods for the test method used. A sufficient number of dilutions must be used to obtain results that will have a minimum 2 mg/l dissolved oxygen (D0) depletion and 1.0 mg/l D0 residual. A minimum of 3 dilutions is required and 5 is recommended if acceptable D0 depletions and residual limits cannot be obtained with 3 dilutions (Standard Method (SM), 2001 edition, 5210 B, 5c.). For SM 5210 B, the following summarizes the requirements for unseeded BOD5/CBOD5:

- If **DO depletion** is less than 2.0 mg/l and the sample concentration is 100% (no dilution except for seed, nutrient, mineral, and buffer solutions), actual seed-corrected, DO depletion may be reported as the BOD5/CBOD5 even if it is less than 2.0 mg/l.
- When all dilutions result in a **residual DO** less than 1.0 mg/l, select the bottle that has at least 2.0 mg/l DO depletion and has the greatest amount of dilution water (least amount of sample) to estimate the value and report as follows. Adjustments will need to be made for seeded BOD5/CBOD5 samples.

# BOD5/CBOD5, mg/l > <u>DO Depletion, mg/l</u> X 300 ml

ml sample

Example: Three dilutions were conducted and all had the minimum 2 mg/I DO depletion. However, residual DO concentrations were all less than 1 mg/I. Use the bottle with the greatest dilution (least amount of sample) to estimate the result. First, calculate the result as if DO residual were at least 1.0 mg/I, then report the result as greater than this calculated value.

Volume of Sample Used	1.5 ml	3 ml	6 ml
Initial DO, mg/l	6.6	6.5	6.4
Residual DO, mg/l	0.1	0	0
DO depletion, mg/l	6.5	6.5	6.4

BOD5/CBOD5, mg/l > <u>DO Depletion, mg/l X</u> 300 ml ml sample

> BOD5, mg/l > <u>6.5 mg/l</u> X 300 ml 1.5 ml

> > BOD5, mg/l > 1300 mg/l

Report as ">1300" on the Daily tab of your DMR along with a comment regarding the test failure and what will be done to prevent such issues in the future as well as any operational issues if an effluent limit violation is indicated.

#### 13. What are the non-numeric codes and how do I use them?

Non-numeric codes may be used when numbers are not appropriate. To view available non-numeric codes, open a DMR and insert an asterisk or \* symbol in the appropriate cell. A list of available codes should appear on the right side of your screen. Note that some codes are appropriate for the Summary but not the Daily DMR tabs and vice versa. The following is a summary of the non-numeric codes. Please be sure to use the asterisk or "star" symbol (usually shift 8) when using the codes, with no space between the asterisk and the letter.

Code	Description
*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 not Conducted for this Species this Reporting Period

#### 14. 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.

MDEQ 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, refer to the document "Water Bureau Policy and Procedure WB-015, Significant Figures." Please contact your District staff person to discuss any issues and obtain a copy if needed.

### 15. What is "stage?"

Stage codes are used to describe the parameter or its monitoring locations and are listed in the left-hand column of the Summary DMR in parentheses along with the parameter and in the second header row of the Daily DMR.

The codes are listed on the DMR form to help describe sample locations since 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 final effluent (stage code 1). Stage codes may also describe calculated data. Commonly used stage codes are listed in the following table.

Stage Code	Code Description
#	Cumulative
1	Final Effluent
В	Prior to Disinfection
G	Influent
K	Percent Removal
R	Intermediate
(	Intermittent (during chlorination)
)	Continuous (during chlorination
*	Intermittent (during bromine use)

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

#### 16. Should I leave blanks on the "Summary" tab of our DMR form?

No, do not leave blank cells on your Summary tab unless there was no reportable discharge during the month. If your facility had no reportable discharge, please see question 8. If you otherwise leave cells blank on the Summary tab, you will receive a validation error and MiWaters will not accept your form.

See question 13 for a discussion of non-numeric codes. For example, if sampling was not required that month for a particular parameter, insert "\*G" on the <u>Summary tab</u>. Note that leaving blank spaces on <u>Daily</u> tab is acceptable.

#### 17. Should I leave blank cells on the "Daily" tab of our DMR form?

Yes, you may leave blanks on your *Daily* tab if appropriate. Entire <u>rows</u> 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 and none was required.

Note that entire *columns* should not be left blank or MiWaters will return a validation error (unless there was no reportable discharge during the entire month). If no monitoring was conducted for a parameter during the month, use the appropriate non-numeric code (e.g. \*G) in any cell in the applicable column(s). You only need to add the non-numeric code once in a column to explain monthly monitoring not conducted. See question 10 for a discussion of non-numeric codes and missed monitoring. See question 13 for a list of commonly-used non-numeric codes.

# **18.** *I see violations listed for submitted DMRs. How does MiWaters determine the number of violations each month?*

- For daily maximum or minimum limits, the number of violations equals the number of days that the permit limits were exceeded that month.
- For 7-day averages, the number of violations equals the number of consecutive 7-day periods when the 7-day average permit limits were exceeded (i.e. it is a rolling average from day 1 through 7, day 2 through 8, etc). For general permit lagoons, 7-day averages are calculated during the discharge events only (not including days before or after).
- For 30-day averages, only one violation occurs in a month for each permit limitation exceedance.
- Load limits and concentration limits are considered separate limits and may generate separate violations.
- Failure to submit the DMR by the 20<sup>th</sup> of each applicable month is a violation.

- Failure to conduct required monitoring will result in a violation for each parameter and each day that monitoring was missed.
- Certain non-numeric codes indicate violations, including \*A, Sampling Equipment Failure; \*C, Laboratory Problem/Error; \*D, Laboratory Results Not Received in Time for Report; and \*H, Did not sample as required by permit.
- 19. 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 DMR this month. How should I report this additional monitoring?

You may report the additional monitoring as a "General Report Comment" on the Summary tab if there is no column on the Daily DMR or row on the Monthly DMR for that parameter. Include the date of sampling and result(s).

#### 20. Can I copy and paste data to a DMR form from an Excel spreadsheet?

Yes, you may for the Daily tab. Scroll to the bottom of the Daily tab and click on the "Convert Data from Text" button. Paste tab-delimited data from a spreadsheet into the text area in the pop-up box that appears and click the "Convert" button to populate the DMR form. You must copy and paste <u>all</u> your data at once, and your spreadsheet must match the columns and rows of the Daily tab exactly. In other words, you will need to set up a spreadsheet that mimics the content of the Daily tab exactly and copy and paste the data all at once.

Data may not be uploaded from a spreadsheet to the Summary tab at this time.

### **Reporting Violations**

# 21. If I have a violation (e.g. failed to sample, effluent violation) that I report on my DMR, what else needs to be done?

MiWaters requires that you insert a comment for every violation. Click on the comment symbol to the right of the field where you added the data value that exceeded permit limitations or failed to sample, etc. If the violation was a monthly average violation, and did not pose a potential danger to public health or the environment, this comment is generally sufficient. If the violation was for a parameter that had a daily maximum or minimum limit, immediately contact your MDEQ compliance staff and follow-up with a written report as required in Part II.C.6 of your permit. Note that the telephone contact (with a person, do not leave a message) and report should be made as soon as you become aware of the violation (i.e. when results of analysis were received), not when you are compiling your monthly report.

### Submitting DMRs

#### 22. How do I know if I can submit a DMR for a site?

To submit a DMR once it is ready, you must have *certifier* status for that site. You can view your roles and status by signing in to MiWaters, selecting the site, clicking on the *Authorized Users* area (left navigation pane, bottom of list), and clicking on the "open" button to the right of your name. Scroll down to view your role and certifier status.

#### 23. How do I become a certifier?

Sign in to MiWaters, select the site, and click on the *Authorized Users* area (left navigation pane, bottom of list). A list of authorized users (past and present) should appear. Click on the "open" button to the right of your name. If you have the role of administrator, you may click on the "Request Certifier Access" button. You must then click on the "Download the Certifier Agreement Form here" link and print a <u>paper</u> copy of the form, fill it out, sign it, and mail the original to the address listed on the form. If you have the role of editor, the administrator for your site must request certifier access for you and sign the third page of the Certifier Agreement Form.

#### 24. If I am a certifier, how do I submit my DMR?

Once you have the certifier status (see question 23), you may submit the DMR once it is complete and meets validation requirements. After you have input the data, entered any needed non-numeric codes, and provided comments for any violations for both the daily and summary sheets for all monitoring points, click on the "Save" button (bottom left of screen). Then click on the blue "Validate and Review" button at the top of your screen. Any errors will be listed as well as any effluent limit violations. You may click on the "open" button to the right of each error to correct it. Violations are listed for your information and are not validation issues, although all violations must have a comment inserted to the right of the violation on the Daily and/or Summary tabs. If there are validation issues, see question 25 below for trouble-shooting tips.

If you see a message saying that "you may submit when ready" after you click on the "Validate and Review" button, click on the green "Certify and Submit" button at the bottom of the screen. You will then need to check the box for the certification statement, enter your password (the same one you used to log in to MiWaters), answer a security question (using the same capitalization, spacing, and wording as when you initially answered the question), and click the green "Submit" button.

If successful, a "DMR Submission Confirmation" screen will pop up that provides details about the submission and has a "Download Copy of Record" button for your use if you wish (optional). Click the "OK" button to exit. You should also receive a notification (in the *Notifications* area of the navigation pane and an email, depending on your user preferences) with similar information.

If you instead see a screen that says "You are Not an Approved Certifier" after you click on the "Certify and Submit" button, and it is appropriate for you to become a certifier for your site, click on the "Request Certifier Access" button. You must click on the "Download the Certifier Agreement Form here" link and print a <u>paper</u> copy of the form, fill it out, sign it, and mail the original to the address listed on the form. If you have the role of editor, the administrator for your site must request certifier access for you and sign the third page of the form.

You may also receive an error message if you use an incorrect password or security question answer or fail to mark the certification statement checkbox.

#### 25. Are the Daily and Summary DMR submitted separately?

No. Unlike the e2DMR system, daily and summary DMRs are submitted together as a package.

# 26. I received a message from MiWaters that says there are validation issues. How do I troubleshoot the problems?

After you click on the blue "Validate and Review" button at the top of your screen, any errors will be listed as well as any effluent limit violations. You may click on the "open" button to the right of each error to return to the appropriate field and correct it. Violations are listed for your information (they do not make a DMR invalid) but you must insert a comment to the right of each cell where a violation occurs for the DMR to be considered valid. If there are validation issues, please look for these common mistakes:

- Failing to insert a comment when there has been a violation. Comments are required and can be inserted next to the result that is in violation by clicking on the comment symbol to the right of the result cell.
- Inserting a space between the less than sign and the numerical value (e.g. "< 1.0" rather than "<1.0")
- Inserting a "0" instead of a value (e.g. "<0.1") or non-numeric code
- Inserting a space before the less than sign
- Using a non-numeric code letter without the leading asterisk (e.g. "G" instead of "\*G")
- Inserting a space between the leading asterisk (\*) and non-numeric code (e.g. "\* G" instead of "\*G")
- Reporting "ND" or "NA" instead of a numerical value or non-numeric code (see Question 13 for a discussion of non-numeric codes)

- Entering "y" or "n" instead of "yes" or "no"
- Failing to enter at least one data point or non-numeric code for each column. Some columns appear to be duplicated (e.g. pH), but the second column is to allow for the reporting of multiple samples. If only one sample was taken, report the same data in both columns.
- Misplaced commas (MiWaters allows commas but only correctly placed, e.g. 1,000 but not 10,00 or 100,0)
- Inserting a space before your numerical result
- Forgetting to use a leading zero before the decimal (e.g. ".2" instead of "0.2")
- Inserting double decimal points
- Reporting the unit in the same field as the value

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

#### 27. How do I know if MiWaters has received and accepted my submittal?

After you have successfully submitted your DMR form, a message will open up on your screen that notes submission date, time, identifying numbers, and reporting period as well as the submitter details. You may click the "Download Copy of Record" button to download a copy of this submittal data. When you choose the site and select *Apps, Requests, and Reports* in the navigation pane, you will see a list of DMRs. You should see the status "submitted" for the DMR that you submitted. It will be listed with a status of "draft" if it has been opened (or opened to revise) but not submitted.

If you try to submit a DMR and do not have certifier access or there are errors in how you filled out the form, you will immediately receive a message that you cannot submit the DMR. See questions about entering data into DMRs and/or certification if your DMR is not accepted. See question 26 for a list of common validation errors.

### Saving DMRs

#### 28. I sometimes have problems saving data to my DMR 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 DMR. To avoid this problem, please save your data at least every 5 minutes to keep your connection active.

#### **Errors in DMR Forms**

# 29. I have a new or newly reissued permit. When I pull up the DMR forms, however, the new limits/parameters are not listed correctly. What should I do?

In the case of permit reissuance (or modification) where new limitations or monitoring are required, the DMR forms should reflect any changed or new limits once the previous permit record is closed out properly by DEQ staff in MiWaters. If the DMR does not look correct, see question 3.

# 30. The daily DMR form has additional columns. Are these correct? If so, what data should I put in these columns?

See Question 3.

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

See Question 3. If those conditions do not apply, please contact your District staff person for assistance.

### Correcting DMRs

#### 32. How do I correct or update a DMR that has already been submitted?

Log in to MiWaters and select the site. Go to *Apps, Requests, and Reports,* scroll down and click on the "View DMRs" button. View the list of DMRs and click on the "Revise" button to the right of the DMR that you want to revise. Make your revisions, add a comment in the General Comment Section about what was changed, click the "Save" button, and proceed with the DMR submission process.

#### 33. If I revise our DMR after the 20<sup>th</sup> of the month, will we get a "late reporting" violation?

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

### **Record-keeping**

#### 34. Am I required to print a hard copy or save an electronic copy of our DMR submittals?

No, you are not required to keep a copy of your DMR submittal. However, note that associated laboratory reports, bench sheets, etc. must be retained for a minimum of three years per Part II.B.5. of your NPDES permit and these records must be available for inspection under Part II.D.9. of your permit. If you are a POTW, Monthly Operating Reports must also be retained and available for inspection in either electronic or hard copy (see question 36). If required records are saved electronically, there must be a backup in a safe location in case of system failure.

#### 35. How do I print a hard copy of our DMR?

Right now there is not an easy way to print DMRs as they appear on your screen. For a submitted DMR, using internet explorer as your browser, you may go to *Apps, Requests, and Reports* and click on "View DMRs" to see a list of your DMRs. To the far right of each row, you will see a "Download" button. Click here and DMR and associated information will be downloaded to a compressed file folder. Three files will list meta data (about the submitter and submittel dates), the Daily data, and the Summary data in Excel format.

### **MORs and DMRs**

#### 36. What is the difference between MORs and DMRs?

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/commercial or storm water only sites. 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) or chemical feed rates. 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, *DMR*s are required to be submitted on a monthly basis through the MiWaters 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 DMRs primarily focus on effluent quality; exceptions include permits for 2-stage granular activated carbon (GAC) treatment, which may include influent and intermediate monitoring requirements.

This publication is intended for guidance only and may be impacted by changes in legislation, rules, policies, and procedures adopted after the date of publication. Although this publication makes every effort to teach users how to meet applicable compliance obligations, use of this publication does not constitute the rendering of legal advice.