Questions answered in our user group meeting on 9/15/10.

1.   **What is the status of the EPA grant money, how is the money intended to be spent to get us to a finished 2.5 (contracting, storage space, etc.), what is the time frame the money must be used for (until spent or a specific fiscal year), how does this fit into the current budget and efforts (other modules) for CIWQS?**

We received the Notice of Award yesterday (Tuesday, 9/14/10). The awarded amount will be $150,000 for the development of the system to transmit data from eSMR to ICIS.

The application specified that $150,000 would be used for contracting services. Storage space needs would be included with general CIWQS storage needs. This money can only be used for the activities related to transmitting DMR data to EPA and would not impact other CIWQS efforts. Some staff time will need to be diverted to support the effort. Ongoing maintenance would come out of the general CIWQS maintenance budget.

The money should be spent within two years.

2.   **Can eSMR 2.5 meet the CROMERR requirements, technically feasible and funded? Will the log in for eSMR 2.5 be upgraded for everyone submitting any data or will there be different log-in requirements for those submitting DMRs?**

Regardless of eSMR 2.5, eSMR will have to meet the requirements of CROMEER. We are implementing a combination of technical and procedural changes to meet the requirements. The technical changes are being done through our regular maintenance contract, though some modifications will be required with eSMR 2.5. As an example, we are creating a zip file containing everything that is submitted with a report. If we use eSMR 2.5, we will modify the zip file to also include DMR data.

3.   **How is the COR (DMR data transmitted for ICIS) intended to be saved in eSMR 2.5? Will this COR be available to the Discharger and the Public? NetDMR allows download of the XML files. Does CIWQS have the budget to handle storage of CORs? Example for LACSD facilities, equivalent of 200 hardcopy pages or 1500 parameters on our semiannual submittal, but how enhanced tool is handling them line by line that would be multiplied by 5 (2 possible quantities and 3 possible concentrations), so up to 7500 rows of DMR data in the enhanced tool). How will this data be kept separate from publicly accessible CIWQS data.**

As mentioned above, the Copy of Record will be the zip file created when an eSMR is submitted. CROMERR requires that the COR be made available upon

request. CROMERR also requires that the system show the data to be submitted in a human readable format. In eSMR now we do this through the data submittal tab and through the downloadable pdf. The DMR data will be flagged as DMR data and we envision having a similar tab to show this data that can be downloaded to Excel. It will also be added to the pdf report.

At this point, the cost of data storage is relatively low, but the backup of any data that the Water Board collects is more problematic. The Water Board will be implementing a new back-up system, which will reduce the storage burden of backup data. The storage needs of eSMR 2.5 will be combined with the storage needs of the rest of CIWQS.

Reports are designed to show certain information. Since the DMR data will be flagged, we will be able to exclude it in reports that are created.

4.   **Can eSMR 2.5 provide some meaningful feedback to the data submitter as to the data validity or compliance verification when the data is transmitted to ICIS?**

Hard errors, not compliance type errors, can be coded into eSMR 2.5 and a modified PET Tool so that the user encounters them and can fix them on the eSMR side, before the data is transferred to EPA.

Compliance errors are more difficult. At this point, we can display a copy of the reporting requirements and limits, but adding any comparisons between what has been entered and the requirements/limits may not be feasible. However, an alternative is to schedule reports in ICIS that would be automatically run and then sent via email to a designated address. This requires that the data be in ICIS.

5.   **Can eSMR 2.5 provide the legally responsible official a way to sign and submit DMRs for multiple facilities? (NetDMR can do 200 DMRs in various facilities assigned to a signatory authority on a single log in)**

eSMR 2.5 will work like eSMR does where the legally responsible official logs in, navigates to the facility that data will be submitted for, then to the order number, and finally to the report. To submit data or "sign for" another facility, the LRO would navigate back to the main menu and then to the facility selection screen. The user does not have to log out.

6.   **How will a beta version of eSMR 2.5 function? DMR submittal would go electronically and how could we tell what is going into ICIS to validate the process is working correctly? Waiting for violations to show up in ECHO on submittal of data using a beta system or final version of eSMR 2.5 is unacceptable. We would send in our paper versions as usual and how would we know if the error was from manual entry typo by DMR Desk or from bad data submittal? How would a roll-out work for successful submittal? What**

would the DMR desk's function and funding be for if all were submitting electronically.

In terms of testing the system in a beta version, a test CIWQS environment would be connected to the test version of ICIS. The procedures established for error notification in the final system would be reproduced in the test system. During a dual submission period, any data that is found in ECHO would be from the paper version.

When a facility was ready to submit DMR data through eSMR 2.5, they would enter their data into eSMR. It should not be entered into the production eSMR system unless the facility is ready to submit to the production version of ICIS.

The DMR Desk at State Board would likely do much of what it does now, which is following up on unsubmitted reports and errors submitted. Some of their duties would be reduced because they will not have to send out hard copies of DMR reporting forms.

EPA grant money funds the entry of DMR data into ICIS. When this is no longer necessary, the grant money can be used for other Water Board work, such as inspections.

7. **Does the State have the budget to provide training for eSMR 2.5 and increased help desk support?**

   We hope by working within existing formats, eSMR/PET Tool and DMR forms, the support needed beyond what currently exists for eSMR will be lessened. If additional Help Desk support is needed, we will likely re-organize the Help Desk so there are more resources with eSMR/eSMR2.5 expertise.

8. **How would the data format handle which DMR the data is on? (For San Jose Creek WRP there are 19 different DMRs on a semiannual submittal)**

   Additional column(s) would be added for limit season ID, permitted feature ID, and limit set designator, that along with the monitoring location code, would identify what data set was being submitted. Data would be entered in one worksheet with different selected combinations of limit season ID, permitted feature ID, limit set designator, and monitoring location code.

9. **If we go with NetDMR or eSMR 2.5, will the state provide PET Tool-like templates for DMR data?**

   We anticipate that with either system, a file similar to the PET Tool template can be provided to aid the discharger is providing the required data elements.

10. **Would the current DMR Help Center be responsible for answering NetDMR questions?**

The State would have to provide support for NetDMR, even if we use the national instance. The questions would likely be routed to the State's DMR Help Center.

11. **In NetDMR and in eSMR2.5, what will be the process when new permits are adopted?**

The process for both systems would be similar. As happens now, when a new permit is adopted, it is sent to a contractor to be coded into ICIS. With either system, once it is coded, an empty slot file would be sent to a designated email address to be reviewed. If problems are found, the discharger will call the DMR Help Center who will then communicate with the contractor to make changes, if necessary.

12. **In eSMR2.5, how will errors in submissions get back to the discharger?**

See question 4.