The CIWQS Public Reports web site allows interested users (dischargers, State and federal staff, environmental groups, and the public) to find NPDES permit violation reports, facility reports and enforcement actions, sanitary sewer overflow violation reports, and mandatory minimum penalty information covering the past 10 years. The site gives compliance information pertaining to California facilities regulated under the Clean Water Act and the California Porter Cologne Water Quality Control Act. Currently, data are refreshed overnight. NPDES violations found on the site are entered by permit holders (dischargers) and Regional Water Board staff (case workers).

Discharger members of the CIWQS eSMR User Group thank the State Water Resources Control Board (Water Board) for involving stakeholders in the development of this program and request that the following recommendations be considered for implementation in the CIWQS Public Reports module regarding posted web site information, data handling and validation business practices:

A. Allow a one-month review period after discharger data submittal, for Regional Water Board staff to review discharger self-reported and case worker-identified violations before they are posted to the CIWQS Public Reports web site. Dischargers feel the State must maintain a program where it is able to verify the accuracy of information in the Public Reports module submitted by permittees and other regulated persons.

Currently, the CIWQS eSMR is programmed to automatically send violations to the CIWQS Public Reports web site by the next day. Violation data posted on the site can be entered by dischargers and/or Regional Water Board staff. Dischargers are to self report NPDES-required data and violations specified by their NPDES permit due dates. Regional Water Board staff may review submitted eSMR reports and have the authority to add or remove violations at any time.

1) For case worker entered violations, this one-month review process gives the discharger response time before these violations are posted to the web site.
2) It allows the case worker and discharger time for discussion and assessment of unclear permit requirements and potential violations.
3) The review process supports the State and Regional Water Board's mission to report accurate water quality information to regulatory agencies and other concerned parties. Complete and accurate data are needed by regulators and other concerned parties in their efforts to protect public health and the environment.
4) Our understanding is that CIWQS NPDES data will eventually be transferred to EPA's ICIS database and the ECHO web site. If this data transfer is to occur, then dischargers feel that a review and correction process implemented in the CIWQS will help ensure that data sent to EPA ICIS are of higher quality than if this process is not implemented. Please note that EPA is mandated to allow the states/regions 30 days to review and correct NPDES data, and a total of 90 days is available for the entry, review and correction of public water system data.

B. Implement an error reporting system similar in content and process to that of EPA's ECHO system (as explained on the ECHO web site; see below) to correct data misreported by dischargers and/or case workers. Presently, CIWQS Public Reports contains erroneous violations that leave NPDES dischargers concerned that the

public will continue to receive faulty data, which in turn, affects the public's perception of them.

Over the past two years, dischargers have contacted State and Regional Water Board staff to correct violations reporting errors only to be put off an additional year. A system for timely correction of errors needs to be implemented by State Water Board staff.

Comment [RB3]: Build this into the reports, whereas, the primary key identifier for the record is built into the "mailto" link. Additionally, the mailto link could derive who to send to based on the regulatory measure and staff assigned with a certain role/relationship. If deriving the staff contact is not an option, a centralized e-mail box for a potential QA/QC shop could work.

From EPA's ECHO web site (http://www.epa-echo.gov/echo/how_to_report_an_error.html):

Error Reporting Data Flow

This section describes the steps involved in the error reporting process. The error reporting flow chart summarizes the same information graphically.

1. User notices a potential error.
2. User clicks on "Report Error" button, is prompted for basic contact information and information about the nature of the error, and submits the error online.
3. User receives an email confirmation that EPA has received the error.
4. User receives a second email (usually within 2 business days) that the error has been routed to an EPA or state Action Officer for research. User is provided with the email address for this Action Officer. User may decide to contact action officer to expedite changes. If more information is needed to process the error notification, the action officer may contact the requestor.
5. User receives a final email with the resolution by the action officer, and general information about when any needed corrections will show up in the system.
6. Correction will be seen by the user at the next time of data refresh.

C. Allow a CIWQS Public Reports data disclaimer regarding data quality, in addition to current explanation on data completeness, which is similar in content to that found on the EPA ECHO site. A detailed explanation of the data found on the site could help alleviate potential public misinterpretation of contents.

See excerpts below regarding EPA ECHO data disclaimers.

Excerpt from Indiana Department of Environmental Management's (IDEM) web-site (http://www.in.gov/idem/5028.htm - queried on July 30, 2008).

"Please Note: IDEM believes that the ECHO website can be a very useful tool for researching the compliance and enforcement histories of regulated facilities. However, the compliance status of facilities, as listed in ECHO, can be misleading. One frequent problem is that U.S. EPA and the states have different definitions of what constitutes a formal enforcement action, and of when such cases are resolved. For example, if a facility has ever been subject to an enforcement action, ECHO continues to show that facility as out of compliance until the enforcement case has been formally resolved by U.S. EPA's standards, and regardless of the presence or absence of current violations. Another problem is the small percentage of errors* in the system, that IDEM and U.S. EPA have been working with stakeholders to correct.

As you use the ECHO searchable database, please keep in mind that the site attempts to summarize complex issues. This may lead to misinterpretations.

In all, U.S. EPA reported only about 5,700 data errors among the over 800,000 sources/facilities listed in the ECHO database. Error ratios were as follows: wastewater (PCS) 32%, air (AFS) 32%, and hazardous waste (RCRAInfo) 36%. "

Excerpt below is from Enviro.BLR.com. web site (http://209.85.141.104/search?q=cache:IEKsEqbK8GUJ:enviro.blr.com/display.cfm/id/42965+epa+echo&hl=en&ct=clnk&cd=23&gl=us - queried on July 30, 2008).

"Some industry professionals, however, have pointed out flaws in the system, including inaccuracies in certain information categories, leaving many concerned over the possibility that the public is receiving faulty data, which, in turn, could paint their companies in a bad light.

To ensure accuracy, EPA incorporated an on-line error reporting system in ECHO. Less than one percent of the facility reports were found to have compliance or enforcement data errors. Of 8,882 error notifications submitted, 93 percent have already been addressed."

D. Discharger members of the CIWQS eSMR User Group recommend that a CIWQS database systems audit and a discharger self-audit (optional) occur at the end of each year, as an annual routine business process, for the purpose of reviewing the past 12 months of submitted data. A systems audit was also recommended in the March 2008 CIWQS Review Panel's Powerpoint presentation. See page 16 and 22 of the presentation addressing data quality assurance, quality control, and data cleanup issues:

> Page 16
> 1) Devote more focused effort to QA/QC and data cleanup
> 2) Develop coherent plan that prioritizes data cleanup and identifies needed resources and timeframe
> 3) Create formal QA/QC mechanisms, including user participation
> 4) Make QA/QC an integral part of database administration and operation
>
> Page 22
> 1) Rebuilding user constituencies, and system validation
> 2) Additional progress needed on data cleanup, reporting, user interfaces

E. Include a link called "Recent Additions" on both the Public Reports and eSMR web sites that explains recent changes, listed from newest to oldest, as a way of communicating to the public what changes or recent additions have occurred.

We, again, thank the Water Board for this opportunity to provide feedback and support the State's efforts to improve the CIWQS Public Reports web site.

Comment [RB4]: Before Rueen-Fangs departure she conducted a system audit on eSMR2. Her findings were addressed in issue 5466 in Mantis. Some focus needs to be redirected to this effort because it requires all programmers working on the different modules to assist. Her basic exercise was to take a snapshot of the database and then perform transactions using the interface and then 'audit' as to whether data populated the tables correctly.

Comment [RB5]: Just put the release status reports out on the website. Easy breezy.