

Comments and questions from our user group meeting on 7/21/10.

**1. Qualifier**

Are you using the same data field in the EDF for the qualifier? ND and DNQ would not be valid data for the DMR.

*If we make ND/DNQ acceptable qualifiers, the appropriate NODI code can be populated. By allowing these as qualifiers, the qualifier column can be consistent between the SMR and DMR data entry tabs. Alternatively, another method could be used.*

**2. DMR corrections**

Anything that is incorrect on the DMR form is typically footnoted and described in the bottom. These corrections are submitted to the DMR desk, but we continue to footnote them until the form is corrected. I assume that this would be a problem for data that is expected when the line item isn't supposed to be there at all and would fail a data check. This is obviously something we need to work out to get correct DMR forms. The point of concern for the Tool is that any parameter could have a footnote that we would like to include in the bottom of the page. We would like to know what is currently done by the hand-entry process. Perhaps these do not even go anywhere when entered into ICIS and we are wasting our time? Would be an attachment to the submittal be more appropriate? We do have a letter and attachment that is submitted with our DMRs currently.

*Problems with permit coding should be resolved outside of CIWQS through the DMR Help Center. We could do this by sending a copy of a DMR prior to submittal so dischargers could see how the permit is coded.*

*The footnotes are not currently entered into ICIS.*

**3. Exceedances**

Any time there is a number in the NO. EX (column J) there must be a comment/explanation at the bottom which always references an attachment. How does data transfer for the comment/explanation at the bottom of each page? Is the comment field from column R of the SMR tab appropriate?

*ICIS doesn't require an explanation for exceedances. CIWQS will keep a record of comments regarding violations. Currently comments do not get entered into ICIS.*

**4. Required Format**

Do users have to use the PET Tool to use this?

*No. Organizations can create a file that has the same format (using the same codes) as the resulting file from the PET Tool that is uploaded to CIWQS.*

**5. Parameter**

I'm confused on whether this would be converted to the code the EPA uses for transfer internal to CIWQS or would those be mapped to a parabel to submit EDF data. We have some of our wet weather parameters "faked" by the EPA using another parameter.

*For parameters, yes, EDF codes will be mapped to PCS codes.*

*We will need to look at the different scenarios for conditional requirements. These may be captured in a different column.*

## 6. Data types

At first glance these are okay.

*The values that we use in the mock-up appear to be the most popular ones, but after further review, ICIS actually contains many more. Our tool should be expanded to handle all of those that ICIS can accept.*

## 7. Frequency

This column is not as DMR expects. These are in the DMR instructions. The DMR form itself has the frequency listed in text format, but the expected data is numeric. We fill in the exact number of samples taken in the time period covered by the DMR. While it might seem that this is a short finite list, it is very extensive list when you consider all the things that might and do occur. If this data actually maps to a data field in ICIS formatted for a number / number then this needs to do the same and allow entry rather than selection off a list.

Examples:

1/7 means weekly

4/30 weekly, but one was missed.

1/1 for daily,

25/30 for daily only taken 25 days

30/31 for daily only taken 30 days in a 31 day month

5/5 for weekdays,

7/5 for weekdays, but taken daily,

X/30 for weekly or monthly samples with extra samples taken, 1/30 to 30/30

X/90, 2/90, 3/90 for quarterly sample taken some number of times during the quarter.

X/180, 2/180, 6/180 for semi-annual samples taken some number of time during the quarter.

For grab samples taken at outfalls only on weekdays (not raining or holidays) when there is flow it might be something like 21/21 or 20/21 if there was no flow at the time of sampling one day.

*We can have either numeric values or narrative values that map to the numeric values that ICIS will accept.*