



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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MEMORANDUM

DATE: OCT - 7 2011

TO: Regional Office Directors
Division of Environmental Quality

John Madras, Director
Water Protection Program

FROM: ^{ASR} Alan J. Reinkemeyer, Acting Director
Division of Environmental Quality

SUBJECT: Improvements for Processing Water Pollution Discharge Monitoring Reports

Thank you for providing knowledgeable staff to participate in the workgroup concerning Discharge Monitoring Reports. Leanne Tippet Mosby asked the workgroup to find the parts of our processing system that could be improved and to come up with some workable remedies.

Division offices receive over 75,000 Discharge Monitoring Reports (DMRs) annually and staff spend considerable time sorting through and entering data. Staff also issue a significant amount of initial enforcement documents. Over 1,500 Letters of Warning (LOWs) and over 275 Notices of Violation (NOVs) are usually issued every year for failing to submit reports or for exceeding permit limits. Occasionally permittees erroneously receive one of these documents.

Based on the workgroup's results, I am directing changes as outlined below:

- The Division of Environmental Quality will prioritize development of an electronic system for electronic DMR submittal.
- As a preliminary step to e-DMRs, Division, Regional Office and Water Protection Program staff will conduct a business process analysis and develop uniform DMR processing procedures. This will include development of standardized forms for permittees to use, with standardized formats for reports. This will eliminate the significant staff time currently required to sort out the required information that is

submitted in various formats and sometimes with much extraneous information. Also, to facilitate communication, the DMR forms will require contact information for at least one individual at a facility that will be designated to deal with DMR issues or problems.

- Automation, when practical, is strongly encouraged. Consideration should be given to using Crystal Reports developed by Keith Bertels to establish a list of DMR violations, (Attached are directions for use of the Report Portal, or rePortal, with the Crystal Reports.) With that said, any LOW/NOV must be reviewed by inspection or permit staff familiar with the specific facility prior to issuance. An LOW/NOV is a tool to compel an action on the part of the facility to address a compliance problem. Therefore, there may be occasions where a facility will show up on an automated report where an LOW/NOV should not be issued. For example:
 - Once permittees are issued an LOW or NOV for a violation and the responsible party has submitted and started to implement a plan of action, the permittee will not be issued additional LOWs or NOVs for the same violation(s). Staff in the Water Protection Program will modify the Division's Compliance Manual to clarify the process. Regional Office staff may contact the Enforcement Section on a case by case basis if they feel additional LOW/NOVs are warranted.
 - Regional Office and Water Protection Program staff shall consult with Hazardous Waste Program before issuing LOW/NOV's to facilities under a RCRA corrective action permit. Normally, if a facility is complying with a corrective action permit remedy, an LOW/NOV should not be issued for an exceedance of a permit limit for circumstances beyond the control of the facility. (See previous memo on this topic from me dated July 8, 2011). Similarly, if there are other on-going requirements from other programs that will remedy causes of noncompliance, consult with that program's staff to determine if issuing LOW/NOV's adds value to the resolution rather than serving as a noncompliance marker, and proceed accordingly.
- Missing DMR's is an uncorrectable violation. However, once the compliance issue is addressed and the LOW/NOV for missing DMR's is resolved, the database needs to be updated to reflect this fact. The Division and Program will establish a special code to enter in the database for this situation.
- The Division will work with the Regional Offices to ensure sufficient, adequately trained staff are available to handle DMR issues.
- WPP should carry out an enforcement initiative for habitual DMR non-reporters. The program will proceed with an enforcement initiative for non-submittal of DMRs. This will focus on facilities missing most, if not all DMRs, and work through a priority

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established to reflect the most environmental risk posed by violators as shown by the number of parameters to be reported. It may, but need not, also address other potential violations.

Please contact Steve Feeler, if you have any questions on these improvements.

Attachment

c: Steve Feeler, Deputy Director, Division of Environmental Quality
Water Quality Forum members
Director's Office

rePortal

Running a Report

Follow this link to the rePortal: http://nr-vs2rptprod/DNR_Reportal/Login.aspx

Log in using your power-on username (like nrbertk) and password

Use the folder structure on the left side of the screen to navigate to the report you want. Many of the reports one would expect to be associated with ACE are actually located in the "Enterprise Reports" folder because they access ACE and MoCWIS information from the Enterprise Data Warehouse.

Click on the name of the report to run it.

Though some reports have permanent passwords to allow retrieval of information from the database, others do not. If a log-on screen appears, enter your power-on username and password. Click "Log On."

Some reports will allow filtering of information displayed in the report. If this is the case, a screen will open for this purpose. Reports written by ITSD typically let a user leave items blank. Reports written by Keith typically require something in every filter criteria. Enter any needed information and click on "OK".

If you want to print the report, click on "Print this Report" in the upper left hand of the screen. Do not simply click on your browser's print button, because this will not work right.

If you want to change the filter criteria and re-run the report without re-entering your username and password, click on the refresh button  at the top of the web page (not your browser's refresh button).

rePortal

Scheduling a Report

Follow this link to the rePortal: http://nr-vs2rptprod/DNR_Reportal/Login.aspx

Log in using your power-on username (like nrbertk) and password.

Use the folder structure on the left side of the screen to navigate to the report you want. Many of the reports one would expect to be associated with ACE are actually located in the “Enterprise Reports” folder because they access ACE and MoCWIS information from the Enterprise Data Warehouse.

Click on “Schedule Report” to the right of the desired report.

The rePortal opens a screen to collect information needed to establish a schedule. Enter the information into the various sections

Parameters – This section allows the user to filter the information that displays in the report. As with running the report without a schedule, Keith doesn’t know how to let the user leave criteria fields blank.

Destination – In the drop-down list, choose “E-Mail”. When the screen changes to expand the section, enter the e-mail addresses of the sender and recipient (like keith.bertels@dnr.mo.gov). Check the “Add Attachment” box and enter an attachment name into the space provided. It helps if you provide the appropriate suffix for the file type you will choose (like Keith.pdf for a file you want to open using Adobe Acrobat). If you don’t include the suffix, then your computer won’t know what software to use when opening the e-mail attachment. Enter a subject for the e-mail message and replace the body of the message with something meaningful to you. The default language in the body must be removed, regardless of what you type in this area.

Database Parameters – Enter your power-on username (like nrbertk) and password, if needed.

Format – Choose a file format from the drop-down list. This should agree with the suffix you used in the Destination section. Bear in mind most reports created by Keith were designed with Adobe Acrobat in mind. If you send them to yourself as Excel spreadsheets, there will be unneeded, blank rows and columns.

Run Time – Choose to run the report now or at a specified time. If you choose to run at a specified time, enter the additional information in the indicated format. If you choose a run time and then set the report to run repeatedly, I believe the run time affects the entire schedule. For instance, if you choose midnight and then schedule to run every day, the report will run daily at midnight.

Recurrence – Enter information about the schedule by which you want the report to run.

Event and Event to Trigger – Leave these sections alone. They allow a user to run a report only after a specified event, such as a database refresh. If you believe you need such control, we will need to ask ITSD how to do this.

Click on Schedule.