

ICIS/ECHO Update

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Water Protection Forum
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A Brief History Lesson

- Missouri Clean Water Information System (MoCWIS) came online late 2007-2008
 - Houses all permit, compliance, enforcement and WQS data
- Integrated Compliance Information System (ICIS) also came online 2008
 - States are either Batch or Direct Entry
- Enforcement Compliance History Online (ECHO)
 - displays facility DMR and narrative condition compliance

A Brief History Lesson

- Missouri is a batch state
- MoCWIS was designed around the draft schema for ICIS/NPDES originally
 - Chronic issues from the start
 - False violations in ECHO
 - Permit rejections
 - DMR non-receipt
 - Parameter exceedances
 - Report non-receipts

In the Past...

- Data Management Unit (DMU) would:
 - Clean-up data by hand
 - Verify compliance for facilities
 - Write letters for facilities detailing their compliance
 - Work tirelessly to find solutions
 - Continue to see non-compliance issues

What We Have Accomplished!



WPP and ITSD Project

- Began in January 2017
 - A team from WPP and ITSD began meeting on a weekly basis
 - Diagnose issues
 - Updated to current schema v. 5.8
 - Create and execute enhancements
 - Still ongoing



ICIS Batch Issues and Solutions

- Issue
 - DMR rejection because of report frequency
 - DMRs with 1/3, 1/12, 3/12 frequency causes DMR rejection
 - False violations in ECHO
 - Ex. 1/3 that starts in November but DMR due in January
- Solution
 - Instruct permit writers to have DMR frequency on calendar quarters
 - Ex. 1/3 should start October for DMR due in January
 - Already implemented and seeing results

ICIS Batch Issues and Solutions

- Issue
 - Duplicate address information for contacts
 - Complete Rejection by ICIS; address information can only be submitted for one contact
- Solution
 - Modify XML batch to only send owner information and main contact Information
 - Already implemented and seeing results

October 26, 2017 EPA Visit

- Hands on assistance from EPA headquarters subject matter expert and Region 7 counterpart
- We came in with list of issues
- We came out with a better understanding of the process
 - Many great ideas how to proceed with batch fixes
 - Additional resources will be provided to help



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What We Are Going to Accomplish!



ICIS Batch Issues and Solutions

- Issue
 - Acceptance of minimum levels (ML)
 - ML for certain parameters (ex. Total Residual Chlorine) is accepted by MoCWIS
 - ICIS does not accept ML
 - Shows as a limit exceedance in ECHO
- Solution
 - Modify the XML file to send NODI Code B “Below Detection” if parameter meets MoCWIS minimum level

ICIS Batch Issues and Solutions

- Issue
 - Permit termination
 - Not currently sent in batch causing false violations in ECHO
 - Must be done manually by DMU staff
- Solution
 - Modify XML batch to send termination information
 - Permit number
 - Termination date

ICIS Batch Issues and Solutions

- Issue
 - Compliance tracking status start dates
 - Batch would send compliance tracking status start date for a certain permit transaction
 - Rejected by ICIS because the start date would violate ICIS business rules
- Solution
 - Modify XML batch to stop sending status dates
 - ICIS Business Logic will auto-populate this information.

ICIS Batch Issues and Solutions

- Issue
 - Inactive parameter codes in use in MoCWIS
 - Causes DMR rejection
 - False violations in ECHO
- Solution
 - Modify MoCWIS parameter tables to active codes
 - Submit request to ITSD to update codes on permit instances
 - Push previous DMR data that had been rejected

ICIS Batch Issues and Solutions

- Issue
 - Latest permit instance ID is rejected
 - Permit information transfer previously failed
 - Historical Issue from the beginning of the batch process
- Solution
 - EPA showed DMU staff SQL to force or replace major permits to correct permit version
 - This will lead to limit set and DMR acceptance

ICIS Batch Issues and Solutions

- Issue
 - Permit modification rejected transaction
 - WPP staff modify a permit; ICIS/NPDES will sometimes reject the new permit instance
 - Lack of limit set and DMR history in transaction
- Solution
 - EPA currently has a contract with Windsor Solutions
 - Use Windsor to update our node plug-in to configure modification data before being sent

Future Actions

- Issue
 - Historically inaccurate DMR data causing false violations in ECHO
 - ECHO displays 3 years of history
- Solution
 - Remove all of Missouri's information from ECHO
 - Repopulate with major/minor permit information
 - Repopulate with 5 years of major permit DMR data
 - Repopulate with minor permit DMR data as of 01/01/2017

Timeline as of Today

- XML vatch enhancements to be completed, tested and implemented by end of 2017
- Work with Windsor Solutions early 2018
- Repopulate ICIS/ECHO with clean data spring 2018
- DMU will continue to update and maintain databases as needed



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Questions??

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