The following questions were received by DEP during the on-line training sessions held on November 16 and 17, 2015 for the new eDMR system. Each question is presented as received followed by DEP's response.

Q: **After we submit a monthly DMR report, how long will we have to wait for PADEP to add comments? How often will we need to check back on submissions to see if any follow-up is needed?**

A: DEP will not add comments to submitted DMRs. The eDMR system does not have that capability. If DEP has questions or comments concerning a submitted DMR, DEP will contact the permittee by phone, email or other correspondence to discuss.

Q: **Are supplemental forms that were originally downloaded, filled out, and then uploaded still needed?**

A: Supplemental forms downloaded from the DEP website are still used with eDMR. You will continue to complete supplemental form spreadsheets and upload them into the new eDMR system. In the future DEP envisions that such forms will be completed on-line.

Q: **Are we required to submit non-compliance reports in the same time restraints as the required call in?**

A: Oral notification of a pollution incident must occur immediately (i.e., no later than 4 hours) from the time the permittee became aware of the incident. This oral notification cannot be done through the eDMR system. Non-Compliance Reports for pollution incidents must be submitted within 5 days of the incident, unless DEP waives the requirement (see Part A of NPDES permits). The eDMR system should be used to submit the Non-Compliance Report electronically and satisfy the 5-day written report requirement. Submission of the Non-Compliance Report can be done any time, independent of the DMR report submission. A Non-Compliance Report is also part of each DMR submission. Effluent non-compliance is summarized on the report, and permittees are given the opportunity to report any other incidents or permit non-compliance.

Q: **Can a certifier add another certifier?**

A: No, a certifier cannot add another certifier. A registration form and Trading Partner Agreement must be submitted to DEP. You can find links to these forms on DEP's eDMR website.

Q: **Can a certifier view or print the DMR prior to submitting it? In other words is there a save option prior to actual submission?**

A: Yes, there is a preview option at the bottom of page while preparing the DMR and there is a preview option available on the submission screen.

Q: **Can multiple preparers enter data?**

A: Multiple preparers can enter data on the same report. It is not recommended that multiple preparers attempt to enter data for the same outfall simultaneously.

Q: **Can only the certifier revise a submission?**

A: Any preparer or certifier can revise a submission. Only a certifier can submit the revision.

Q: **Can the certifier submit in the event that the preparer could not log in?**

A: Yes, the certifier has the same capabilities as the preparer (plus more).

Q: **Can we electronically upload data or copy/paste outfall data into eDMR?**

A: No, this feature is not available at this time. DEP envisions this capability will eventually be incorporated into eDMR.

Q: **Can we submit PDFs of the forms currently available as an attachment?**

A: Yes, the supplemental forms can be submitted as PDF attachments. Where available, DEP strongly recommends that DEP's spreadsheet versions of supplemental forms be utilized and submitted as attachments.

Q: Can we upload supplemental reports in the same format as the DEP templates? Or do we have to use the DEP templates? We are transitioning to a system that will compile the reports for us.

A: DEP strongly encourages that the spreadsheet versions of supplemental forms be utilized. In some cases the NPDES permit requires their use (e.g., Annual Chesapeake Bay Spreadsheet). DEP's spreadsheets contain all DEP-approved calculations, which means DEP's compliance staff have greater confidence in reported data. DEP staff can assist you with converting/copying your data into DEP's spreadsheet format. However, ultimately, unless the permit requires otherwise, you may submit your own spreadsheets.

Q: Can we use Windows 10 with the GreenPort website?

A: Yes, you can use Windows 10 with GreenPort. GreenPort and eDMR are dependent on the web browser. With Windows 10 you have a choice between Microsoft Edge and Microsoft Internet Explorer. We recommend using Internet Explorer. GreenPort and eDMR were not tested with Microsoft Edge.

Q: Can you show an example of an inspection done in lieu of sampling?

A: If the permit authorizes an inspection in lieu of sampling and submission of a DMR, the permittee would need to enter the eDMR system and record a NODI Code of "GG" (Conditional Monitoring) for each parameter result on the DMR, attach the inspection report, and then submit.

Q: Did the copy/paste option go away?

A: There is no option to paste the entire set of data for an outfall into eDMR. There was a copy/paste option in the previous eDMR (E2) system but it was never functional.

Q: Did you show how to print your DMRs?

A: Blank copies of DMRs can be printed from the "Create or Edit Report" screen by clicking the "View" icon. Copies of submitted DMRs can be printed from the "View/Revised Submitted" screen by clicking the "View" icon.

Q: Do we have to use Internet Explorer to access eDMR?

A: The system was developed for compatibility with Internet Explorer 9 and later. We have not found problems using other browsers, but cannot guarantee they will work.

Q: Do we still need to attach a signed non-compliance report if a parameter exceeds the permit limit? Or can we just type the information in?

A: The eDMR system will automatically determine effluent non-compliance and present it on a Non-Compliance Report prior to the report submission screen. Users will not need to type effluent non-compliance into the on-line form, and no other attachment(s) are required.

Q: Do we still report excursions by number per parameter?

A: No, excursions (or exceedances) are calculated automatically during a non-compliance check during the report submission process.

Q: Do we still submit lab accreditations only once per year if nothing changes?

A: A permittee must submit the Lab Accreditation supplemental form as follows: 1) as an attachment to the first DMR following the effective date of a new or renewed permit, and 2) as an attachment to a DMR anytime a laboratory or analytical method changes during the permit term.

Q: Do you have the new version of the nutrient monitoring report for Chesapeake Bay supplemental report?

A: The supplemental reports continue to be available from the DEP website. There is also a link to the forms available after logging in to eDMR.

Q: Does the new eDMR system generate an "exceedance alert" in the data entry mode as the existing E2 system does now?

A: No, you are alerted to reported values outside the required limits during the non-compliance check prior to report submission.

Q: **For submissions due on November 28, do we go through GreenPort (eDMR) or E2?**

A: Submissions due November 28 will go through E2 unless they are submitted late after the eDMR system is launched. Revisions to reports submitted via E2 will also be submitted via eDMR.

Q: **How do we add a new preparer?**

A: A certifier can add a new preparer. Reference the "eDMR Greenport User Administration User's Guide" document for instructions.

Q: **How do we check to determine who are currently certifiers at our facility?**

A: Contact the Applications Helpdesk at 717-705-3768 or depgreenporthelpdesk@pa.gov to inquire who the current certifiers are. In the future we envision that users will be able to see a list of all users associated to a facility and their roles.

Q: **How do we register to be the certifier?**

A: A registration form and Trading Partner Agreement must be submitted to DEP. You can find links to these forms on DEP's eDMR website.

Q: **How long does it take to process the registration/agreement forms for access to eDMR?**

A: Processing times vary depending on DEP's workload.

Q: **How many preparers and certifiers/submitters can we register for a single facility?**

A: There is no particular limit imposed on the number of certifiers registered for a facility. It is recommended to have at least two.

Q: **How many preparers can access one permit at one time to enter data? We have lots of data that needs entered and since there is no way to electronically populate we will likely want different people populating different outfalls.**

A: Multiple preparers can enter data on the same report. It is not recommended that multiple preparers attempt to enter data on the same outfall simultaneously.

Q: **If a facility has a permit revision, will it be the facility's responsibility to add additional parameters or will they be added on the site by PADEP?**

A: If a permit amendment or renewal results in additional parameters, in comparison with the previous permit, those parameters should be available on the next DMR report when the parameters become effective. E2 sometimes would not display those changes automatically, and DEP would need to manually fix the report in those cases, but we expect those problems will no longer occur.

Q: **If an SSO event happens and we call PADEP, but aren't ready to submit an eDMR report, should we wait to submit it with our regular report or submit the SSO report earlier?**

A: If an SSO or other unauthorized discharge or pollution incident occurs it must be reported immediately to DEP by phone. The permittee then has 5 days to submit a written report to DEP (unless DEP waives the report). If the timing of the incident is such that the routine DMR submission process cannot be used in order to satisfy the 5-day requirement, the permittee must initiate, complete and submit an independent Non-Compliance Report through the eDMR system.

Q: **If I am a certifier at multiple plants, will one GreenPort account and password work for each of the plants?**

A: Yes, a single GreenPort account (username) and password can be used for multiple plants.

Q: **If we already have a certifier in the E2 system, does the certifier need to re-register for eDMR?**

A: No, the certifier does not need to re-register. They do need to enroll in the eDMR system as described in the "eDMR GreenPort Registration User's Guide."

Q: **If we already have a GreenPort password for our water system and a different log-in name and password for E2, which will be our eDMR password?**

A: You will continue to use the same GreenPort password as for your water system after enrolling in the eDMR system, as described in the "eDMR GreenPort Registration User's Guide." The E2 password will no longer be used after enrolling. In addition, the E2 PIN is no longer needed to submit reports.

Q: **If we have a certifier prepare the report, can we select someone else to actually certify and submit the report for checks and balances purposes?**

A: Any other certifier can open the report and submit it.

Q: **If we leave the cause/comments for non-compliance blank, can we submit the report?**

A: At this time, yes, a user can submit a report while leaving the Cause of Non-Compliance, Correction Action Taken and Comments blank. DEP anticipates that the system will be enhanced in the future to require selection of a Cause of Non-Compliance and the Corrective Action Taken prior to report submission.

Q: **If we set up a new GreenPort account and enter our E2 username and password for access to the eDMR system, is any additional notification required to start using the eDMR system?**

A: No, there is no additional notification required after enrolling for the eDMR system through GreenPort.

Q: **If we submit a non-compliance via eDMR system in the middle of a reporting period, do we also need to report it with the monthly DMR for that facility?**

A: No. If you submit a Non-Compliance Report for an unauthorized discharge or pollution incident independent of the DMR, you do not also need to report the same incident on the Non-Compliance Report that is part of the DMR submission process.

Q: **In the Flow parameter limit, what is MGD?**

A: MGD is an abbreviation for "Million Gallons per Day."

Q: **Is eDMR available yet? GreenPort does not display an option for eDMR Reporting when we click the "Enroll" button.**

A: eDMR enrollment is available now. The system will be available on Monday, December 14.

Q: **Is the non-compliance form in the list of documents that we can attach to an eDMR?**

A: No. There is no need to attach the Non-Compliance Report to the DMR report because it is built into the DMR submission process.

Q: **Is the SSO report replaced by reporting a non-compliance incident through eDMR?**

A: SSOs must be reported to DEP by phone immediately. If there was an "SSO report" attached to your permit and the report is to be used to satisfy the 5-day written report requirement following an SSO event, pursuant to Part A of the NPDES permit, then yes, a Non-Compliance Report submitted through the eDMR system can replace the SSO report. However, the permittee should verify that the same information will be provided through the Non-Compliance Report as in the SSO report attached to the permit. If in doubt, the permittee should complete and submit the Non-Compliance Report electronically and also attach the SSO report to the Non-Compliance Report.

Q: **Is there a history of when viewers and preparers are authorized or revoked?**

A: No, there is not.

Q: **Is there a limit on uploaded file sizes?**

A: There is a limit, but it is large enough that we do not expect anyone to be impacted by it. Contact the Applications Helpdesk at 717-705-3768 or depgreenporthelpdesk@pa.gov if you encounter a file size limitation.

Q: **Must all DMRs now be submitted electronically, include those submitted by paper previously? Also what about contract plants that were submitted by paper?**

A: DEP will be requiring use of the new eDMR system by essentially all NPDES-permitted facilities. This is now a federal requirement, following EPA's publication of the "NPDES Electronic Reporting Rule" in October 2015. If a facility is still using paper to submit DMRs, it will likely need to convert over to the eDMR system during 2016.

Q: **Preparers can revise but submitters must submit that revision?**

A: Yes, a preparer can create a revision, but only a certifier can submit it.

Q: **Should we create a GreenPort account before submitting an eDMR registration form and Trading Partner Agreement? How long does it take to process the registration/agreement and facilitate eDMR submissions?**

A: It is preferable to create a GreenPort account before submitting a registration form and Trading Partner Agreement. The time to process the registration varies according to workload.

Q: **We have a TDS quarterly average under DMR, how do I use eDMR to submit data?**

A: The TDS parameter should appear on a quarterly DMR report, in which case the average of all samples collected during the quarter would be used to report the quarterly average result. Contact DEP's Central Office eDMR staff at 717-787-6744 or the regional DEP office that issued the permit for questions relating to the interpretation of permits.

Q: **We have an excursion number parameter in E2 where we always input zero. Will that remain in the new eDMR?**

A: No, that number is replaced by an automated non-compliance check.

Q: **We have two parameters that are not out of compliance on the semi-annual report, but the MDL forces them to appear that they are. We can simply add a comment that it was a ND (non-detect) result, not a non-compliance. How does the new system handle this?**

A: You could handle this situation the same way in the new eDMR system. However, it is possible that each time the result may appear on the Non-Compliance Report.

Note that EPA's "Sufficiently Sensitive Methods" rule generally requires that "non-detect" results be reported down to the level of the permit limit (unless a waiver is granted). Typically where an effluent limitation is too stringent for analytical capabilities a permit condition is used to allow reporting to a less stringent value, and compliance will be demonstrated if a non-detect is reported at that value. That value becomes in essence a surrogate limit in the sense that DEP's compliance assessment process uses the value to compare it against submitted results. Contact DEP at 717-787-6744 if there are questions on this issue.

Q: **We have two staff personnel watching this webinar on the same computer, but only one of us signed in. How do we both get credit for participating in the webinar?**

A: The webinar is not eligible for continuing education credits.

Q: **What does DEP do if one certifier accepts a new preparer and another certifier denies access to the new preparer?**

A: The certifiers must coordinate among themselves who will have access. The last action submitted (accepting or revoking) will take effect.

Q: **What if I am not sure if I have a GreenPort account already? How do I find out?**

A: Contact the Applications Helpdesk (depgreenporthelpdesk@pa.gov or 717-705-3768) for assistance.

Q: **What if my current E2 password doesn't meet the password criteria for eDMR criteria?**

A: You may be able to use the same E2 password for your GreenPort password; if not you will need to create a new password.

Q: **What is "Operator Certification Number" on the comment page after the attachment upload page?**

A: It is a field where the license number can be entered for those who are certified water or wastewater operators. It is an optional field for those that hold the certification.

Q: **When I have a manhole overflow, is that considered a non-compliance discharge? Now I write an overflow letter to DEP with most of that same info. Will reporting this on eDMR meet the requirements? Now I have a certain amount of time to notify DEP.**

A: A manhole overflow is a sanitary sewer overflow (SSO) that is prohibited; if it occurs, immediate notification to DEP by telephone is required. For SSOs, the Non-Compliance Report should be used to satisfy the 5-day written report requirement (either submitted independent of the DMR anytime or submitted as part of the DMR). You may attach a letter to the Non-Compliance Report or DMR to explain the SSO event(s), if desired. Also see previous answers to similar questions.

Q: **When I switch over to the eDMR system can I change my email without confusion?**

A: Yes, you can change your e-mail for the eDMR system. You will login to DEPGreenPort and click the "Account Administration" button to update your e-mail address.

Q: **When is the rollover date to the new site?**

A: The rollover is tentatively scheduled to begin at 5 PM on Friday, December 11. The E2 system will no longer be available after that time. The new system is expected to be available Monday, December 14.

Q: **When will presentation, FAQs, and webinar be available for those who are unable to attend these sessions?**

A: The video of the webinar and presentation is available at these links: eDMR Overview (MP4), eDMR Overview (WMV). The files are provided in to different formats for compatibility with more systems.

Q: **When will we be able to enroll for eDMR in GreenPort?. I went in Greenport, which I am already enrolled in, and eDMR doesn't show as an option yet. Will I be able to sign up for eDMR before the switchover.**

A: Enrollment is now available at www.depgreenport.state.pa.us as described in the "eDMR GreenPort Registration User's Guide."

Q: Who can be a certifier?

A: Certifiers must be a responsible corporate officer, a general partner, a proprietor or a principle executive officer in accordance with 40 CFR 122.22(a) or are otherwise a duly authorized representative of that person in accordance with 40 CFR 122.22(b) and are authorized to submit reports to DEP. See the eDMR Trading Partner Agreement for additional information.

Q: Who will receive e-mails that an eDMR is ready to submit or submitted at a location?

A: All certifiers, preparers, and viewers will receive the e-mail notifications.

Q: Will all plants have to test influent points?

A: Influent monitoring for Total Suspended Solids and BOD5 is typical in NPDES permits issued to publicly owned treatment works for Chapter 94 organic loading and federal secondary treatment 85% removal purposes.

Q: Will annual reports like the storm water DMR be located on this system as well?

A: DEP may make any DMR available through the eDMR system.

Q: Will DMRs submitted under E2 be available for revision in the new system? We need to revise a DMR submitted on E2 by a certifier who is no longer here and is suspended from the system.

A: Yes, DMRs submitted via E2 can be revised using eDMR.

Q: Will I be able to save a copy of the DMR report as a PDF document on my computer instead of printing it?

A: Yes, you can save a copy of the DMR report as a PDF document instead of printing it.

Q: Will our current password (PIN) to submit DMRs stay the same?

A: Your password used to login to E2 will no longer be used after enrolling for eDMR. It will be replaced by the GreenPort password you choose. The PIN that you use to certify submissions in E2 will no longer be used. eDMR does not use a PIN.

Q: Will the new system autofill the "Sample Type" and the "Frequency of Analysis" for each parameter according to our permit?

A: No, eDMR requires you to confirm the sample type and frequency when completing the report. DEP may enhance the system to autopopulate sample type and frequency of analysis in the future.

Q: Will the permit owner still need to approve requests? Or will the certifier be able to add people?

A: The certifier can approve requests for preparer and viewer access. The permit owner or authorized representative will still need to submit registration requests to DEP to add certifiers.

Q: Will there be a step-by-step manual for eDMR?

A: Yes, the manual will be posted to the DEP website and will be available in the eDMR system.

Q: Will there be any options to upload electronic data files instead of manually entering the data?

A: No, eDMR does not support XML, Excel, or bulk copy/paste data entry at this time. DEP plans to make enhancements to the eDMR system in the future with this capability.

Q: Will we be able to sign up for eDMR before the switchover from E2?

A: Yes, you can enroll for eDMR now.

Q: Will we be required to upload each of the supplemental reports individually? I currently save all of my supplemental reports (Effluent, Influent, etc.) for each DMR as a PDF and email them all together, not as each individual sheet.

A: You can still continue to group multiple worksheets together into one PDF document and submit that document as an attachment. However, you will need to assign one "type" to the single PDF file (i.e., if you are uploading one PDF document containing the "Biosolids Supplemental Report" and the "Daily Effluent Monitoring Report", you have to select one type of supplemental form to represent both in the PDF file). It is preferable to keep attachments separate so that they can be individually classified by type.

Q: Will we have any preview access before the go live date?

A: eDMR and E2 cannot operate at the same time, so you will not have access to eDMR before the go live date even if you enroll for access before the go live date.