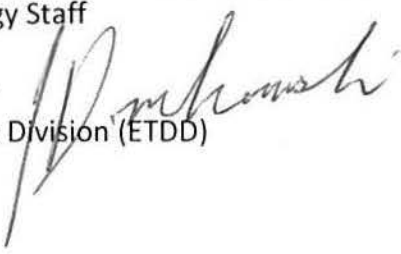


IMPLEMENTATION TECHNICAL PAPER NO. 1

TO: EPA Regional and Authorized State NPDES Permit and Enforcement Coordinators and State Information Technology Staff

FROM: John Dombrowski, P.E., Director
Enforcement Targeting and Data Division (ETDD)
Office of Compliance
US EPA/OECA 

DATE: 22 December 2016

SUBJECT: Implementation Technical Paper No. 1: Public Access to Non-major DMR Data and Compliance Status

Overview

This paper supports implementation of the NPDES Electronic Reporting Rule (40 CFR 127) and Next Generation Compliance. The benefits of this paper include:

- Simplifying data management tasks for EPA Regions and authorized NPDES programs for non-majors filing Discharge Monitoring Report (DMR) data; and
- Gradually increasing the visibility of DMR reporting non-receipt violations and permit compliance status for non-majors in a stepwise manner, so as to allow authorized NPDES programs to review their data prior to public release.

In particular, this paper describes how EPA's NPDES data system (ICIS-NPDES) will handle DMR non-receipt violations for non-majors so that authorized NPDES programs will not need to spend much time addressing erroneous DMR non-receipt violations in ICIS-NPDES. The approach outlined in this paper provides authorized NPDES programs with sufficient time to share facility and permit data with ICIS-NPDES and to conduct outreach, training, and registration for NetDMR and other electronic reporting tools.

Please contact my staff, Carey Johnston, (202) 566-1014, johnston.carey@epa.gov, if you have any questions about this paper.

Implementation Technical Paper No. 1 + Public Access to Non-major DMR Data and Compliance Status +

EPA solicited comment from EPA Regions and states on the following approach for managing DMR non-receipt and quarterly permit compliance status for non-majors. EPA incorporated these comments in to this paper. This schedule outlined in this paper gives authorized NPDES programs several months to review their data prior to public release and make any necessary changes.

- On 1 January 2017, ECHO Gov (but not ECHO) will start showing all DMR non-receipt violations (for all DMR filers) that occur on or after 1 January 2017. ECHO Gov is only available to EPA and states (not the public). ECHO Gov will also be updated to show the permit compliance status [based on the Reportable Non-Compliance (RNC) Status code] for all facilities for the Federal Fiscal Year (FFY) Quarter starting on 1 January 2017 and following FFY Quarters. The permit compliance status for the FFY Quarter starting on 1 January 2017 will be available in ECHO Gov approximately 2 ½ months after this quarter has ended. This timeline gives states several months to review their data in ECHO Gov and make any necessary changes. This schedule also provides states with time to train and register non-major DMR filers for electronic reporting. Unless requested to do otherwise by the authorized NPDES program, ECHO Gov will not show any unresolved DMR non-receipt violations for non-major facilities that occur prior to 1 January 2017. Additionally, ECHO Gov will show the permit compliance status as “Unknown” for non-majors that only have these DMR non-receipt violations (and no other NPDES violations) for FFY Quarters prior to 1 January 2017.

- On 1 July 2017, ECHO and ECHO Gov will be updated so that they start showing all DMR non-receipt violations (for all DMR filers) that occur on or after 1 July 2017. ECHO and ECHO Gov will be changed to show the permit compliance status (based on the RNC Status code) for all facilities for the FFY Quarter starting on 1 July 2017 and following FFY Quarters. The permit compliance status for the FFY Quarter starting on 1 July 2017 will be available in ECHO and ECHO Gov approximately 2 ½ months after this quarter has ended. Unless requested to do otherwise by the authorized NPDES program, ECHO and ECHO Gov will not show any unresolved DMR non-receipt violations for non-major facilities that occur prior to 1 July 2017. Additionally, ECHO and ECHO Gov will show the permit compliance status as “Unknown” for non-majors that only have these DMR non-receipt violations (and no other NPDES violations) for FFY Quarters prior to 1 July 2017.

Attachment 1 describes EPA’s current method for managing DMR non-receipt violations and permit compliance status for non-major DMR filers. Attachment 2 provides scenarios that explain how the approach outlined in this paper will be implemented in ICIS-NPDES, ECHO Gov, and ECHO. See **Figure 1** below for a description of how ICIS-NPDES processing of the RNC Resolution code affects permit compliance status.

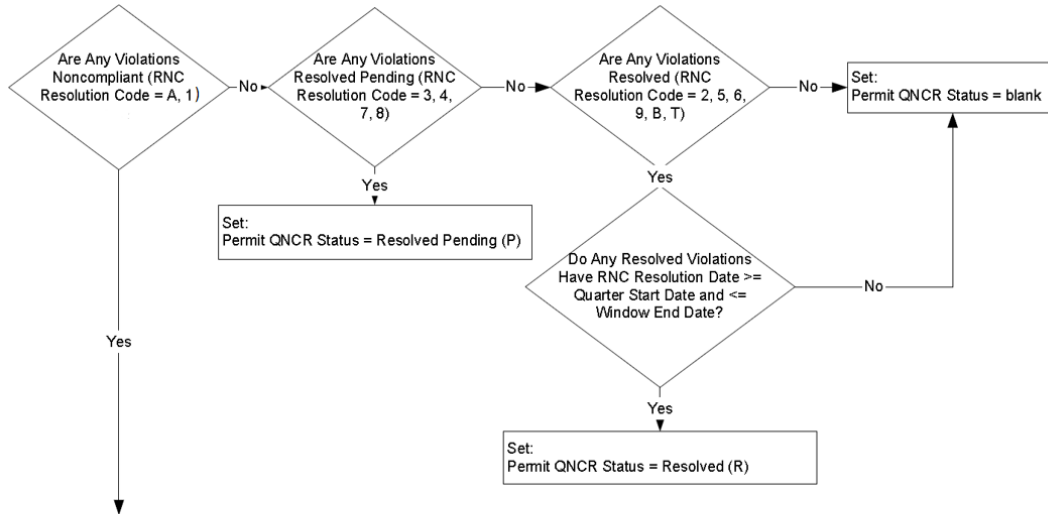


Figure 1. Current Processing of RNC Resolution Code. "

Source: Figure 9.6-33 - Decision Tree for Determining Automatic Permit QNCR Status, ICIS-NPDES Detailed Design Document. Updated with RNC Processing Technical Design, Version 1.17, 9 July 2013. "

TASKS:

Step 1: To implement this paper, ETDD’s ICIS staff will change the ICIS-NPDES RNC Resolution code to “B” (“Resolved – Manual by EPA/State/Tribal Action”) for all DMR non-receipt violations for non-major permittees on 31 December 2016.

This mass manual change in the RNC Resolution code will ensure that all DMR non-receipt violations from non-major permittees that occur prior to 1 January 2017 will be resolved and will not trigger a non-compliant permit compliance status code (e.g., RNC Status code equal to “D”) for future FFY Quarters in ICIS-NPDES. After this mass manual change, the permit compliance status code in ICIS-NPDES for non-major DMR filers with no other NPDES violations will be blank (i.e., null) for FFY Quarters starting on or after 1 January 2017. In development of this paper, ETDD staff coordinated with EPA Regions and states to identify non-major DMR filers that should be excluded from this task.

ETDD staff will turn DMR non-receipt tracking to “On” for all DMR filers in ICIS-NPDES on 1 January 2017. ETDD staff will also turn permit compliance tracking to “On” for all DMR filers in ICIS-NPDES prior to 15 May 2017. ETDD staff coordinated with EPA Regions and states in the development of this paper to ensure that authorized NPDES programs were aware of these upcoming changes and to identify any non-major DMR filers that should be excluded from this task.

ETDD staff will update the visibility rules in ECHO Gov on 1 January 2017 for DMR non-receipt violations and the corresponding permit compliance status for non-major DMR filers as described above. ECHO

Gov will use the ICIS-NPDES permit compliance status code [i.e., the RNC Status code] to show the permittee compliance status.¹

As described above, ETDD staff will also provide states with an easy method through ECHO Gov to identify permittees that have the permit compliance status code of “D” or “N” due to non-compliance unrelated to DMRs (e.g., non-receipt of compliance schedule reports, single event violations) (see Attachment 1 for a description of the permit compliance status codes of “D” or “N”). EPA will distribute information and training resources when these new features become available in ECHO Gov.

EPA and the states will also be able to use ECHO Gov to identify strengths and weaknesses in NPDES electronic reporting as well as identify the list of permittees that have “DMR Non-Receipt” or “Permit Compliance Tracking Status” set to “Off”.² ECHO Gov will also be able to provide the corresponding time period of these “Off” statuses. EPA will update documentation (including data caveats) in ECHO Gov to more fully explain how to interpret a permittee’s compliance status when it is “Unknown”.

This task will be applied to all non-major DMR filers except for specific exceptions that were previously identified by authorized NPDES programs and shared with EPA. This includes permittees that had their “Permit Major/Minor Status Indicator” changed from “Major” to “Minor.” Conversely, this task will apply to permittees that had their “Permit Major/Minor Status Indicator” changed from “Minor” to “Major” but only for the months when the permittee was classified as a “Minor.”

Step 2: To implement the second part of this paper, ETDD staff will change the ICIS-NPDES RNC Resolution code to “B” (“Resolved – Manual by EPA/State/Tribal Action”) for all DMR non-receipt violations for non-major permittees on 30 June 2017.

This mass manual change in the RNC Resolution code will ensure that all DMR non-receipt violations from non-major permittees that occur prior to 1 July 2017 will be resolved and will not trigger a non-compliant permit compliance status code (e.g., RNC Status code equal to “D”) for future FFY Quarters in ICIS-NPDES. After this mass manual change, the permit compliance status code in ICIS-NPDES for non-major DMR filers with no other NPDES violations will be blank (i.e., null) for FFY Quarters starting on or after 1 July 2017. Similar to Step 1, ETDD staff will again coordinate with EPA Regions and states to identify any permitting authorities that wish to opt out of this task.

ETDD staff will update the visibility rules in ECHO and ECHO Gov on 1 July 2017 for DMR non-receipt violations and the corresponding permit compliance status for non-major DMR filers as described above. ECHO and ECHO Gov will use the ICIS-NPDES permit compliance status code to show the permittee compliance status. ETDD staff will update its documentation (including data caveats) in ECHO and ECHO Gov to more fully explain how to interpret a permittee’s compliance status when it is “Unknown”.

Finally, ETDD staff will also publish the “NPDES Electronic Reporting Readiness and Data Completeness Dashboard” to ECHO on 1 July 2017 so that EPA, states, and the public will be able to identify strengths and weaknesses in NPDES electronic reporting as well as identify the list of permittees that have “DMR Non-Receipt” or “Permit Compliance Tracking Status” set to “Off” (as well as the corresponding time period of these “off” statuses).

¹ The ICIS-NPDES RNC Status code will show the permittee compliance status as “Unknown” when one or both of the “DMR Non-Receipt” or “Permit Compliance Tracking Status” data elements are set to “Off.”

² The final rule restricts the use of the “DMR Non-Receipt Tracking” data element to only non-major permittees.

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**Attachment 1 - Current ICIS-NPDES, ECHO Gov, and ECHO Processing of
DMR Non-Receipt Data and Quarterly Compliance Status**

ICIS-NPDES automatically generates DMR non-receipt violations for all permittees (majors and non-majors). ICIS-NPDES automatically creates “Violation” codes for missing DMR values with monitoring requirements (D80) and missing DMR values with effluent limits (D90). Any DMR value not received within 31 days of the DMR form due date results in the generation of a Violation code (D80 or D90). ICIS-NPDES runs a daily process to identify these DMR non-receipt violations.

In particular, ICIS-NPDES automatically identifies a permittee classified as a “non-major” (a.k.a. “minor”) as having one or more DMR non-receipt violations, even in cases where a state receives the DMR data from a non-major permittee but the state does not share these DMR data with ICIS-NPDES. The previous EPA NPDES data sharing policy, 1985 WENDB, only required authorized NPDES programs to share DMR data with EPA for DMR filers classified as “major.” The 2015 NPDES Electronic Reporting Rule requires states to share all DMR data (majors and non-majors) with EPA. See 40 CFR 127.23.

ICIS-NPDES uses these DMR non-receipt Violation codes (D80 or D90) to generate “Reportable Non-Compliance (RNC) Detection” codes [e.g., Non-monthly average DMR value was 30 days overdue (= “K”), DMR monthly average value was 30 days overdue or scheduled report was 30 days overdue (= “N”)]. ICIS-NPDES uses “RNC Resolution” codes to classify the resolution status of these violations (i.e., non-compliant, resolved pending, or resolved). These RNC Resolution codes can be created automatically by ICIS-NPDES or be manually entered by an ICIS-NPDES user.

ICIS-NPDES uses Violation codes, RNC Detection codes, and RNC Resolution codes to create a single permit compliance status code for each permittee for each Federal Fiscal Year (FFY) Quarter. This single permit compliance status code, updated quarterly, is called the “RNC Status” code. ICIS-NPDES generates this permit compliance status code approximately 2 ½ months after the quarter has ended and EPA’s public access website (Enforcement and Compliance History Online (ECHO) - <https://echo.epa.gov/>) uses this code to show the permittee’s compliance status for each FFY Quarter. The hierarchy of the RNC Status code is shown in the table below.

Table A1-1: Hierarchy of System Generated Permit RNC and SNC/Cat. 1 Status Codes in ICIS–NPDES

Code	Status	RNC or SNC/Cat. 1	Description
S	Noncompliant	SNC/Cat. 1	SNC/Cat. 1 for Unachieved Schedule Milestone Violation
E	Noncompliant	SNC/Cat. 1	SNC/Cat. 1 for Monthly (e.g., 30-Day Average/Daily Average) Effluent Violation
X	Noncompliant	SNC/Cat. 1	SNC/Cat. 1 for Non-Monthly (e.g., 7-Day Average/Daily Maximum) Effluent Violation
T	Noncompliant	SNC/Cat. 1	SNC/Cat. 1 for Pretreatment Program Report Non-Receipt Violation
D	Noncompliant	SNC/Cat. 1	SNC/Cat. 1 for DMR Non-Receipt Violation
N	Noncompliant	RNC	RNC for All Non-SNC/Cat. 1 Violations
P	Resolved Pending	N/A	Final Resolution Pending Compliance with Formal Enforcement Action Final Order

Code	Status	RNC or SNC/Cat. 1	Description
R	Resolved	N/A	Final Resolution of Violations
V	Noncompliant	N/A	Non-RNC Violations in the Quarter. For example, the facility has effluent, compliance schedule, permit schedule, or single-event violations in the current quarter; however, is not considered to be in RNC or SNC/Cat. 1.
U	Unknown	N/A	Unknown compliance status.
<null>	Null in ICIS-NPDES "No Viol" in ECHO	N/A	Not considered in violation (including RNC or SNC/Cat. 1)

Sources: Table 6.1-1. Permit RNC Status Flag Hierarchy, RNC Processing Technical Design, Version 1.17, 9 July 2013. ECHO DFR Data Dictionary. ICIS-NPDES (REF_RNC_STATUS).

Note: The definition of SNC is not codified in EPA's regulations and can change as the NPDES program evolves to encompass new enforcement priorities. For example, in September 1995, EPA revised the definition of SNC to include violations of non-monthly average permit limitations by major facilities.³ Additionally, EPA's SNC definition only includes NPDES-regulated entities classified as "majors." For NPDES-regulated entities classified as "non-majors," Category 1 is the most serious level of non-compliance (see 40 CFR 123.45).

ICIS-NPDES users also have the ability to manually override the ICIS-NPDES system generated RNC Status codes after the close of the FFY Quarter using the following RNC Status codes:

- C - Compliant (only manually entered): Facility Should Not Have Appeared on QNCR or Status Code Should Not Have Been Automatically Generated
- Q - Resolved Pending – Compliance Schedule: Revolved Pending – Compliance Schedule (manual only)

As shown above, DMR non-receipt violations initiate a process in ICIS-NPDES that sets the RNC Status code to "D" or "N", for the FFY Quarter if these violations are not resolved before the end of the FFY Quarter. RNC Status code of "D", which is Significant Noncompliance (SNC) for majors and Category 1 non-compliance for non-majors, is generated when one or more entire DMRs are in the status of non-receipt.⁴ RNC Status code of "N" is generated when one or more DMR values are in the status of non-receipt.

Additionally, EPA limits the time period for DMR non-receipt violations to affect the RNC Status code. ICIS-NPDES automatically prevents two-year old (or older) DMR non-receipt violations from affecting the RNC Status code after two years of no DMR non-receipt violations [i.e., ICIS-NPDES sets the RNC

³ U.S. EPA, 2010. NPDES Permit Writers' Manual, EPA-833-K-10-001, Page 11-24. See: <https://www.epa.gov/npdes/npdes-permit-writers-manual>

⁴ ICIS-NPDES process also considers whether a permitted feature has one or more DMR reporting requirements in its DMR non-receipt processing. For example, if a permitted facility has a permitted feature (Outfall 001) with two DMR reporting requirements (001A and 001Q), then ICIS-NPDES would evaluate the DMR reporting requirements for both DMR reporting requirements together. This means that ICIS-NPDES would only generate the RNC Status code "D" when both of the DMRs (001A and 001Q) are in non-receipt status for the same reporting period. Using another example, if a permitted facility has two permitted features (Outfall 001 and Outfall 002), each with only one DMR reporting requirement per permitted feature, then ICIS-NPDES would evaluate the DMR reporting requirements for Outfall 001 separately from Outfall 002.

Resolution Code to “0”, which is “Two Years Past Detection (System Administratively Resolved)”. EPA configured ICIS-NPDES in this manner to help reduce the number of permittees in SNC/Cat. 1 non-compliance due to two-year-old or older DMR non-receipt violations.

Prior to the NPDES Electronic Reporting Rule, ECHO did not show non-compliant permit compliance status codes for non-major DMR filers in most states (the exceptions being Arkansas and Louisiana, as requested by these two states), when the non-compliance was related to DMR non-receipt violations. In particular, ECHO only displayed the permit compliance status as “Unknown” for non-majors with DMR non-receipt violations (and no other NPDES violations) in ICIS-NPDES. The figures below show how ICIS-NPDES displays permit compliance status for a non-major facility with DMR non-receipt violations and how ECHO has previously masked these data.

Figure A1-1: ICIS-NPDES Showing RNC Status (including DMR Non-Receipt Violations) for a Non-Major Permittee

Year	Quarter	RNC Status		
		RNC Status (Automatic)	RNC Status (Manual)	Corrected RNC Status (Manual)
2016	3	SNC DMR Non-Receipt Violation		
2016	2	SNC DMR Non-Receipt Violation		
2016	1	SNC DMR Non-Receipt Violation		
2015	4	Resolved		
2015	3	SNC Effluent Violation Monthly Average		
2015	2	SNC Effluent Violation Monthly Average		
2015	1	SNC Effluent Violation Monthly Average		
2014	4	SNC Effluent Violation Monthly Average		
2014	3	SNC Effluent Violation Monthly Average		
2014	2	SNC Effluent Violation Monthly Average		
2014	1	SNC Effluent Violation Monthly Average		
2013	4			
2013	3			

Note: As previously noted, EPA’s SNC definition only includes NPDES-regulated entities classified as “majors.” For NPDES-regulated entities classified as “non-majors,” Category 1 is the most serious level of non-compliance (see 40 CFR 123.45). This ICIS-NPDES screen uses the label “SNC DMR Non-Receipt Violation” for SNC and Category 1 non-compliance for NPDES-regulated entities classified as “majors” and “non-majors,” respectively.

Figure A1-2: Example ECHO Detailed Facility Report (DFR) Showing “Unknown” (Grey Box with “Unk”) Facility-Level Status (i.e., RNC Status) for the same Non-Major Permittee in Figure A1-1.

Three Year Compliance Status by Quarter

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13*
CWA (Source ID: VA0026514)		04/01-06/30/13	07/01-09/30/13	10/01-12/31/13	01/01-03/31/14	04/01-06/30/14	07/01-09/30/14	10/01-12/31/14	01/01-03/31/15	04/01-06/30/15	07/01-09/30/15	10/01-12/31/15	01/01-03/31/16	04/01-06/30/16
Facility-Level Status		No Viol	No Viol	SNC/Cat 1	SNC/Cat 1	SNC/Cat 1	SNC/Cat 1	SNC/Cat 1	SNC/Cat 1	SNC/Cat 1	No Viol	Unk	Unk	Und
SNC/RNC History				E(EffViol)	E(EffViol)	E(EffViol)	E(EffViol)	E(EffViol)	E(EffViol)	E(EffViol)	R(Resolvd)	W(N/A)	W(N/A)	
	Pollutant	Disch Point	Freq											
CWA	Nitrogen, Kjeldahl, total [as N]	001	Mthly						140%	10%				
CWA	Nitrogen, Kjeldahl, total [as N]	001	NMth						107%	47%				
CWA	Nitrogen, Total As N	001	Mthly		9%									
CWA	Solids, total suspended	001	Mthly						96%	40%				
CWA	Solids, total suspended	001	NMth						49%	46%				

*Quarter 13 is draft/unofficial and has not been fully quality assured. [Read more](#)

Note: ECHO uses the label “SNC/Cat 1” for SNC and Category 1 non-compliance for NPDES-regulated entities classified as “majors” and “non-majors,” respectively. EPA provides documentation on how to interpret this label.

Attachment 2 – Scenarios Showing RNC Code Changes in ICIS-NPDES, ECHO Gov, and ECHO

Note: ECHO uses the label “SNC/Cat 1” for SNC and Category 1 non-compliance for NPDES-regulated entities classified as “majors” and “non-majors,” respectively. EPA provides documentation on how to interpret this label.

Step 1 - Scenario #1 (Non-Major Permittee with DMR Non-Receipt Violations Before and After 1 January 2017)													
One or More Unresolved DMR Non-Receipt Violations in ICIS-NPDES -->						X		X		X		X	
FY Quarter	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13*
Months	04/01–06/30/14	07/01–09/30/14	10/01–12/31/14	01/01–03/31/15	04/01–06/30/15	07/01–09/30/15	10/01–12/31/15	01/01–03/31/16	04/01–06/30/16	07/01–09/30/16	10/01–12/31/16	01/01–03/31/17	04/01–06/30/17
ICIS-NPDES QNCR Code	<null>	<null>	<null>	<null>	<null>	D	D	D	D	D	D	D	D
ECHO Gov Facility-Level Status	No Viol	No Viol	No Viol	No Viol	No Viol	Unk	Unk	Unk	Unk	Unk	Unk	SNC/Cat 1	Und
ECHO Gov SNC/RNC History	<null>	<null>	<null>	<null>	<null>	W (N/A)	W (N/A)	W (N/A)	W (N/A)	W (N/A)	W (N/A)	D (DMR NR)	
ECHO Facility-Level Status	No Viol	No Viol	No Viol	No Viol	No Viol	Unk	Unk	Unk	Unk	Unk	Unk	Unk	Und
ECHO SNC/RNC History	<null>	<null>	<null>	<null>	<null>	W (N/A)	W (N/A)	W (N/A)	W (N/A)	W (N/A)	W (N/A)	W (N/A)	

* ECHO and ECHO Gov's Quarter 13 shows the current (but undetermined -"Und" - compliance status), which is in ICIS-NPDES.

Step 1 - Scenario #2 (Non-Major Permittee with DMR Non-Receipt Violations Before 1 January 2017)													
One or More Unresolved DMR Non-Receipt Violations in ICIS-NPDES -->						X		X		X			
FY Quarter	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13*
Months	04/01–06/30/14	07/01–09/30/14	10/01–12/31/14	01/01–03/31/15	04/01–06/30/15	07/01–09/30/15	10/01–12/31/15	01/01–03/31/16	04/01–06/30/16	07/01–09/30/16	10/01–12/31/16	01/01–03/31/17	04/01–06/30/17
ICIS-NPDES QNCR Code	<null>	<null>	<null>	<null>	<null>	D	D	D	D	D	D	<null>	<null>
ECHO Gov Facility-Level Status	No Viol	No Viol	No Viol	No Viol	No Viol	Unk	Unk	Unk	Unk	Unk	Unk	No Viol	Und
ECHO Gov SNC/RNC History	<null>	<null>	<null>	<null>	<null>	W (N/A)	W (N/A)	W (N/A)	W (N/A)	W (N/A)	W (N/A)	<null>	
ECHO Facility-Level Status	No Viol	No Viol	No Viol	No Viol	No Viol	Unk	Unk	Unk	Unk	Unk	Unk	No Viol	Und
ECHO SNC/RNC History	<null>	<null>	<null>	<null>	<null>	W (N/A)	W (N/A)	W (N/A)	W (N/A)	W (N/A)	W (N/A)	<null>	

* ECHO and ECHO Gov's Quarter 13 shows the current (but undetermined -"Und" - compliance status), which is in ICIS-NPDES.

Step 2 - Scenario #1 (Non-Major Permittee with DMR Non-Receipt Violations Before and After 1 July 2017)

One or More Unresolved DMR Non-Receipt Violations in ICIS-NPDES -->						X		X		X		X	
FY Quarter	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13*
Months	01/01-03/31/15	04/01-06/30/15	07/01-09/30/15	10/01-12/31/15	01/01-03/31/16	04/01-06/30/16	07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18
ICIS-NPDES QNCR Code	<null>	<null>	<null>	<null>	<null>	D	D	D	<null>	D	<null>	D	D
ECHO Gov Facility-Level Status	No Viol	No Viol	No Viol	No Viol	No Viol	Unk	Unk	Unk	No Viol	Unk	No Viol	SNC/Cat 1	Und
ECHO Gov SNC/RNC History	<null>	<null>	<null>	<null>	<null>	W (N/A)	W (N/A)	W (N/A)	<null>	W (N/A)	<null>	D (DMR NR)	
ECHO Facility-Level Status	No Viol	No Viol	No Viol	No Viol	No Viol	Unk	Unk	Unk	No Viol	Unk	No Viol	SNC/Cat 1	Und
ECHO SNC/RNC History	<null>	<null>	<null>	<null>	<null>	W (N/A)	W (N/A)	W (N/A)	<null>	W (N/A)	<null>	D (DMR NR)	

* ECHO and ECHO Gov's Quarter 13 shows the current (but undetermined -"Und" - compliance status), which is in ICIS-NPDES.

Step 2 - Scenario #2 (Non-Major Permittee with DMR Non-Receipt Violations Before 1 July 2017)

One or More Unresolved DMR Non-Receipt Violations in ICIS-NPDES -->						X		X		X			
FY Quarter	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13*
Months	01/01-03/31/15	04/01-06/30/15	07/01-09/30/15	10/01-12/31/15	01/01-03/31/16	04/01-06/30/16	07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18
ICIS-NPDES QNCR Code	<null>	<null>	<null>	<null>	<null>	D	D	D	<null>	D	<null>	<null>	<null>
ECHO Gov Facility-Level Status	No Viol	No Viol	No Viol	No Viol	No Viol	Unk	Unk	Unk	No Viol	Unk	No Viol	No Viol	Und
ECHO Gov SNC/RNC History	<null>	<null>	<null>	<null>	<null>	W (N/A)	W (N/A)	W (N/A)	<null>	W (N/A)	<null>	<null>	
ECHO Facility-Level Status	No Viol	No Viol	No Viol	No Viol	No Viol	Unk	Unk	Unk	No Viol	Unk	No Viol	No Viol	Und
ECHO SNC/RNC History	<null>	<null>	<null>	<null>	<null>	W (N/A)	W (N/A)	W (N/A)	<null>	W (N/A)	<null>	<null>	

* ECHO and ECHO Gov's Quarter 13 shows the current (but undetermined -"Und" - compliance status), which is in ICIS-NPDES.