Electronic Reporting

By: David DiDomenico
Nick Giannetti
Greg Lutchko
Electronic Reporting

- Discharge Monitoring Reports
- Untreated / Unpermitted Discharges
Flow

Electronic Reporting - ANR Online Services Portal
- ANR Online Forms
- Creating an Account
- CROMERR – Subscriber Agreement

Discharge Monitoring Reports
- eDMR – eRule – eReporting
- Implementation in VT
- Submitting a Form
- Self-reporting violations
- Attachments
- Resubmission

Untreated / Unpermitted Discharges
- Law
- Procedure
- Definitions
- Response
- Submitting a Form
Electronic Reporting

Discharge Monitoring Reports

Untreated / Unpermitted Discharges
ANR Online
Agency of Natural Resources Online Services Portal.
ANR-Online Services Portal

Electronically submit:
• Permit applications;
• Transmittals;
• Certifications; &
• Reports.

Features:
• Security;
• Save work and return to it later;
• Submit forms to ANR Departments;
• Electronic signatures;
• Print out receipts of transactions.

Address: https://anronline.vermont.gov/
Forms

**eDMR Form**

Address: [https://anronline.vermont.gov/?formtag=DMR_Prefill](https://anronline.vermont.gov/?formtag=DMR_Prefill)

**Incident Reporting Form**

Address: [https://anronline.Vermont.gov/?FormTag=WW_CSOREport](https://anronline.Vermont.gov/?FormTag=WW_CSOREport)
National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule (eRule)
NPDES eRule

Important Points:

1. Replace most paper-based NPDES reporting;
2. Facilities will be using a new method to report same data;
3. Data will report directly to DEC database & EPA;
4. Improving data accuracy;
5. Save time;
6. Reduce paper.

Address: https://www.epa.gov/compliance/npdes-ereporting
### Implementation in Vermont...

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>March 1, 2017</td>
<td>• Submit E-Reporting Implementation Plan to EPA</td>
</tr>
<tr>
<td>March 15, 2017</td>
<td>• eDMR Reporting Tool is Live!</td>
</tr>
<tr>
<td>March 15, 2017</td>
<td>• eDMR Phase I Reporting</td>
</tr>
<tr>
<td></td>
<td>• 22 facilities to report Discharge Monitoring Data.</td>
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<tr>
<td>April 15, 2017</td>
<td>• eDMR Phase II Reporting</td>
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<td></td>
<td>• Second group to report Discharge Monitoring Data.</td>
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<tr>
<td>May 15, 2017</td>
<td>• eDMR Phase III Reporting</td>
</tr>
<tr>
<td>June 15, 2017</td>
<td>• Full Implementation of eDMR</td>
</tr>
</tbody>
</table>
Site Overview & Demo

https://anronline.vermont.gov/
Electronic Reporting

Discharge Monitoring Reports

Untreated / Unpermitted Discharges
Untreated / Unpermitted Discharges

Act 86
Act No. 86, Bill (H.674): An act relating to public notice of wastewater discharges.

- Sec. 1. 10 V.S.A. chapter 47, subchapter 1A
- 10 V.S.A. § 1278. Operation, management, and emergency response plans for pollution abatement facilities
- 10 V.S.A. § 1295. Notification of sewage and wastewater discharge

Effective: May 4, 2016

Purpose: Provide public notice of discharges to waters of the State that may pose a threat to public health or the environment.

Procedure for Public Notice of Untreated Discharges and Unpermitted Discharge to Vermont’s Surface Waters

Intention:
1. Establish criteria of an Untreated Discharge;
2. Establish State protocol for response to Unpermitted Discharges.

Most Applicable to WWTFs:
1. Untreated Discharge definition;
2. Response to Untreated / Unpermitted Discharge;
   - Public Alert;
   - Incident Report;
   - CSO Signage;
   - Temporary Access Signs.

Address: http://dec.vermont.gov/sites/dec/files/wsm/wastewater/docs/ProcedureUntreatedUnpermittedDischarges.pdf
Untreated Discharges

Unpermitted Discharges
Untreated Discharge

Discharge of wastewater that meets one of the following criteria from a WWTF to waters of the State.

Criteria:
1. CSOs;
2. Overflows from sanitary sewers and combined sewer systems that are part of a WWTF during dry weather flows, which result in a discharge to waters of the State;
3. Upsets or bypasses around or within a WWTF during dry or wet weather conditions that are due to factors unrelated to a wet weather storm event and that result in a discharge of sewage that has not been fully treated to waters of the State;
4. Discharge from a WWTF to a separate storm sewer.

WWTF:
- Treatment plant;
- Collection system;
- Pump stations; and/or
- Attendant facilities;

Permitted by Secretary for the purpose of treating wastewater.
Untreated Discharge

What we expect to see:

1. CSOs;

2. Collection system / pump station overflows;

3. Discharges from a collection system;
   a. i.e. backup, line break, line leak.

4. Effluent that has not received adequate disinfection;
   a. *E. coli* results ≥ 235 colonies/100 ml
   b. An event that the WWTF reasonably expects to result in an *E. coli* result of ≥ 235 colonies/100 ml.
      a. i.e. Disinfection system failure, low total residual chlorine, disinfection system malfunction.

5. Treatment plant not providing primary treatment, secondary treatment, and disinfection.
   a. i.e. Only primary treatment and disinfection due to a power-failure.
Untreated Discharge

What we don’t want to see:

1. One-time NPDES Permit violations / exceedances that do not meet the definition of an untreated discharge.
   a. i.e. BOD/TSS violation, pH violation, 85% removal violation, TP violation, *E. coli* < 235, etc.

2. Any discharge of wastewater that does not reach waters of the State.
   a. If the discharge is at a volume or in an area that may pose a threat to public health keep the WW Program in the loop.

3. Discharges from privately owned collection / pump stations / laterals.
   a. These qualify as Unpermitted Discharges if the Secretary determines that they pose a threat to public health.
Unpermitted Discharge

Discharges to surface waters, not associated with the WWTF, that have the potential to pose a threat to public health or the environment.

Secretary Responsibility:
1. Determine whether or not discharges poses a threat (using criteria);
2. Publicly notice Unpermitted Discharges within 4 hours of discovery;
3. Notify municipality and town health officer.

Municipality Responsibility:
1. Post Temporary Signage.
Unpermitted Discharge

Criteria for determining threat to public health or environment:

• Nature;
• Quantity and location;
• Receiving water;
• Duration;
• Downstream public access areas;
• Presence of a high E. coli count accompanied by high values of NH3, Cl2, MBAS or optical brighteners;
• Public or private drinking water sources; and
• Best professional judgement.

Address:
1. Post a Public Alert.
   • Within 1 hour of discovery, no later than 4 hours.

Some Important Notes:
1. Enter email address for the person submitting the Alert. This will not be seen by the Public.
2. Select Facility from drop-down list. If it’s not there please contact us.
3. This phone number will not be seen by the Public.
4. Indicate waters where the discharge occurred.
5. Provide a description of the location where the discharge occurred. Please refrain from using Outfall Numbers. Stick to landmarks, street names, place name.
6. Enter Permit-ID no dash (3XXXX).

Link to Post: https://anrweb.vt.gov/DEC/WWInventory/SubmitPublicAlert.aspx?PA=0&option=add
Link to View: https://anrweb.vt.gov/DEC/WWInventory/SewageOverflows.aspx
2. Submit an Incident Report within 12 hours of discovery to ANR Online and notify the Town Health Officer.

Vermont Watershed Management in DEC at ANR

This form is to be used by Wastewater Treatment Facilities to submit a public alert as soon as possible, but no lon
REMINDER: You are required to report additional details regarding sewage overflows and incidents within 12 ho

Email Address: 
Facility Name: 
Phone Number: 

Receiving Waters: 

Location Description: 

Password: (6 digits) refer to your permit or email ANR.WSMD@vermont.gov if you have questions about your password

Submit
3. Post a permanent sign at permitted CSO Outfalls.

- Signs were made for Facilities with Permitted CSO outfalls & distributed to DEC Regional Offices.

Municipalities should inspect, maintain and replace signs as necessary.
4. Post Temporary Public Access Signs downstream of:

- Untreated Discharges other than CSOs; and
- Unpermitted Discharges that the Secretary determines pose a threat to human health or the environment.

Timeframe: 48 hours until discharge has stopped.

Templates:
http://dec.vermont.gov/sites/dec/files/wsm/wastewater/images/temp%20sign%20public%20access.jpg
**Sewage Overflows and Incidents Public Webpage**

Address: [https://anrweb.vt.gov/DEC/WWInventory/SewageOverflows.aspx](https://anrweb.vt.gov/DEC/WWInventory/SewageOverflows.aspx)

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**Vermont Watershed Management in DEC at ANR**

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Town</th>
<th>Location Description</th>
<th>Reporting Venue</th>
<th>Data/Time Submission Entered</th>
<th>ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>St. Johnsbury</td>
<td>St. Johnsbury</td>
<td>Intersection of 2 and 200 to 200 feet north</td>
<td>Winooski River</td>
<td>1/30/2017 10:30 AM</td>
<td>56</td>
</tr>
</tbody>
</table>

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**VFW REPORTED OVERFLOWS**

<table>
<thead>
<tr>
<th>Start Date</th>
<th>End Date</th>
<th>Town</th>
<th>Location</th>
<th>Watershed</th>
<th>Estimated Volume (gallons)</th>
<th>Wastewater Treatment Facility</th>
<th>Contact Person</th>
<th>Inspection Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/07/2017</td>
<td>01/07/2017</td>
<td>St. Johnsbury</td>
<td>2 and 200 to 200 feet north</td>
<td>Winooski River</td>
<td>1,000 to 10,000 gallons</td>
<td>Winooski River District</td>
<td>Sen. G. Czarnecki</td>
<td>212-212-1111</td>
</tr>
</tbody>
</table>

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**Wastewater Management in DEC at ANR**

<table>
<thead>
<tr>
<th>Start Date</th>
<th>End Date</th>
<th>Town</th>
<th>Location</th>
<th>Watershed</th>
<th>Estimated Volume (gallons)</th>
<th>Wastewater Treatment Facility</th>
<th>Contact Person</th>
<th>Inspection Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/07/2017</td>
<td>01/07/2017</td>
<td>St. Johnsbury</td>
<td>2 and 200 to 200 feet north</td>
<td>Winooski River</td>
<td>1,000 to 10,000 gallons</td>
<td>Winooski River District</td>
<td>Sen. G. Czarnecki</td>
<td>212-212-1111</td>
</tr>
<tr>
<td>Facility Name</td>
<td>Town</td>
<td>Location Description</td>
<td>Receiving Waters</td>
<td>Date/Time Submission Entered</td>
<td>ID</td>
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<tr>
<td>Jeffersonville</td>
<td>Jeffersonville</td>
<td>Old Main St. manhole overflowing into storm drain.</td>
<td>Brewster River</td>
<td>2/27/2017 11:02:34 AM</td>
<td>66</td>
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<tr>
<td>Montpelier</td>
<td>Montpelier</td>
<td>CSO-023 Bailey Ave Bridge</td>
<td>Winooski River</td>
<td>2/26/2017 8:33:22 AM</td>
<td>65</td>
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<tr>
<td>Montpelier</td>
<td>Montpelier</td>
<td>CSO-009 152 Main St.</td>
<td>North Branch</td>
<td>2/26/2017 8:32:02 AM</td>
<td>64</td>
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<tr>
<td>Montpelier</td>
<td>Montpelier</td>
<td>CSO-007 10 Main St.</td>
<td>North Branch</td>
<td>2/26/2017 8:31:01 AM</td>
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<tr>
<td>Montpelier</td>
<td>Montpelier</td>
<td>CSO-003 Bailey Ave Bridge</td>
<td>Winooski River</td>
<td>2/26/2017 8:29:53 AM</td>
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<td>Montpelier</td>
<td>Montpelier</td>
<td>CSO-001 Taylor Street Bridge</td>
<td>Winooski River</td>
<td>2/26/2017 8:27:29 AM</td>
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<tr>
<td>Vergennes</td>
<td>Vergennes</td>
<td>Below the falls in Vergennes</td>
<td>Otter Creek</td>
<td>2/25/2017 8:26:58 PM</td>
<td>60</td>
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<tr>
<td>Burlington Main</td>
<td>Burlington</td>
<td>Pine st. CSO</td>
<td>Pine Street Barge Canal</td>
<td>2/25/2017 7:02:14 PM</td>
<td>58</td>
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<tr>
<td>St Albans City</td>
<td>St Albans</td>
<td>South Elm</td>
<td>Stevens Brook</td>
<td>2/25/2017 7:01:23 PM</td>
<td>57</td>
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<tr>
<td>Jeffersonville</td>
<td>Jeffersonville</td>
<td>Just downstream from where the Lamoille passes under the Rt 15 bridge.</td>
<td>Lamoille River</td>
<td>2/6/2017 7:19:58 AM</td>
<td>56</td>
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</tbody>
</table>

**NEWLY REPORTED OVERFLOWS:** These overflows are pending review from DEC Wastewater staff.

<table>
<thead>
<tr>
<th>Start Date</th>
<th>End Date</th>
<th>Start Time</th>
<th>End Time</th>
<th>Location</th>
<th>Waterbody</th>
<th>Nature of Incident</th>
<th>Estimated Volume (gallons)</th>
<th>Wastewater Treatment Facility</th>
<th>Contact Person</th>
<th>Submission Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>View</td>
<td>02/25/2017</td>
<td>06:45 pm</td>
<td>08:30 pm</td>
<td>CSO# 007 10 Main St.</td>
<td>North Branch</td>
<td>Authorized Wet Weather CSO Overflow</td>
<td>100 to 1,000 gallons</td>
<td>Montpelier</td>
<td>Kurt Moryka</td>
<td>2V2-TQPF-0RY0</td>
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<tr>
<td>View</td>
<td>02/25/2017</td>
<td>09:30 pm</td>
<td>10:25 pm</td>
<td>Pump Station 9</td>
<td>Otter Creek</td>
<td>Authorized Wet Weather CSO Overflow</td>
<td>1,000 to 10,000 gallons</td>
<td>Middlebury</td>
<td>Robert Wells</td>
<td>2PM-KFNX-8X2Q</td>
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<td>Facility Name:</td>
<td>Rutland</td>
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<tr>
<td>Caller Name And Title:</td>
<td>Rod Monroe / Lab Director</td>
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<td>Municipality:</td>
<td>City Of Rutland</td>
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<tr>
<td>Location (street or site):</td>
<td>West Street Siphon</td>
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<td>Incident Start Date:</td>
<td>02/25/2017</td>
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<td>02/25/2017</td>
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<td>Incident Start Time:</td>
<td>07:19 pm to 07:41 pm</td>
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<td>Estimated Duration Of Event:</td>
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<tr>
<td>Nature Of Incident:</td>
<td>Authorized Wet Weather CSO Overflow</td>
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<td>Estimated Volume:</td>
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<td>Cause Of Discharge:</td>
<td>High Flows</td>
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<td>Type Of Obstruction:</td>
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<td>Point Of Discharge:</td>
<td>Combined sewer overflow structure</td>
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<td>Corrective Action Taken:</td>
<td>None</td>
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<tr>
<td>Waterbody Impacted:</td>
<td>East Creek</td>
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<tr>
<td>Contact Name And Title For Public:</td>
<td>Jeff Wernberg, Commissioner of Public Works</td>
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<td>Public Cell:</td>
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<td>WWX Staff Called:</td>
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<td>Type Of Notification:</td>
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<td>Public Overflow Report For Web:</td>
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</table>

**Description Of Incident:**

High flows caused by an intense rain storm on 02/25/2017 may have resulted in the discharge of a combination of sewage and stormwater from CSO #036 - West Street Siphon. This is an authorized discharge intended to protect the sewer system, to prevent overflows from other parts of the sewer system, and to prevent backups into homes and other buildings. In addition, during this event, 278,060 gallons of urban stormwater were treated through the wastewater treatment facility before returning it to the environment.

**eForm Submission:** 2PM-GSMR-0DTC

**Number:**
Important Links

Wastewater Webpage:
• [http://dec.vermont.gov/watershed/wastewater](http://dec.vermont.gov/watershed/wastewater)

Untreated Discharges:

eDMR:

ANR Online:
• [https://anronline.vermont.gov/](https://anronline.vermont.gov/)

Public Alerts:

Operator Certification:
Questions - Contacts

Permitting / O&M
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Amy.Polaczyk@Vermont.gov

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Kara.Shangraw@sec.state.vt.us