

MEMORANDUM

TO: File

FROM: Carey A. Johnston, P.E.
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SUBJECT: Response to State Comments on Version 1.2 Release

Overview

The Clean Water Act Action Plan “Master Project List” identifies the enhancement and release of the Loading Tool as a key task for implementing Fundamental Change 1 and 3.¹ OECA released Versions 1.0 and 1.1 of the Loading Tool in January and November 2012, respectively. OECA continually receives comments and suggestions from EPA, state, and public on what is working and how to improve this web application.

New Enhancements to the Loading Tool

In response to comments and suggestions from the public and EPA TRI Regional staff, OECA and OEI’s TRI Program have jointly developed new enhancements to the Loading Tool.

- Easier ability to compare and contrast similar wastewater pollutant releases reported through the DMR and TRI data flows for industrial facilities. These new enhancements were developed with input from EPA TRI enforcement and quality assurance staff.
 - TRI Enforcement: EPA enforcement staff target facilities that are non-filers and/or under-reporters as these actions prevent the full public disclosure of toxics. The Loading Tool enhancements make it easier to find these non-filers and under-reporters by utilizing DMR data. In particular, users can for the first time identify facilities based on the amount (pounds or toxic-pounds) or percent difference between TRI and DMR data and/or number of NPDES permit effluent exceedances.
 - TRI Data Quality Assurance: The TRI Program conducts a number of activities every year to ensure the quality of TRI data reported to EPA. The new enhancements to the Loading Tool make it much easier to spot potential errors in TRI data by using DMR data as a comparison.
- Updated the “Facility Information (TRI)” results page to more closely match its sister “Facility Information (DMR)” page by adding a map, receiving water information box, and multi-year pollutant loading report.

¹ See also – “CWA Action Plan Implementation Priorities,”
<http://www.epa.gov/compliance/resources/publications/civil/programs/cwa/actionplan-implpriorities.pdf>.

- Improved the “Advanced Search (DMR)” so that users can search on specific TRI facilities (up to 400) or limit the search to facilities that report DMR data and TRI data.
- Responded to state comments to improve the pollutant loading calculation for intermittent dischargers using the Duration of Discharge parameters (50037, 82517, and 81381).
- Responded to request by South Dakota by adding a quality assurance blue flag on all SD discharges with flows greater than 20 MGD, which is above maximum flow for the largest discharge in SD.
- Updated the “Major Watersheds” lists to match the needs for a number of different users (e.g., TRI Large Aquatic Ecosystem Program, OW’s National Estuary Program).
- Updated all Loading Tool searches to allow users to identify facilities based on: (1) receiving waterbody impairment status; (2) whether discharged pollutants contribute to a waterbody impairment; and/or (3) location in a county with ESA-listed aquatic species (data from U.S. Fish and Wildlife Service).
- More documentation on how to use the Loading Tool for the general public and technical users;
- Minor bug fixes.

EPA and State Review of Version 1.1

OECA released Version 1.2 of the Loading Tool to states and EPA Headquarters and Regional offices on 19 April 2013 for a two week review. This review was facilitated by a password protected website. OECA shared this link and password on its OTIS Lab website. OECA also sent e-mails announcing this two-week review to ACWA, ECOS, Water Data Stewards, NPDES Compliance and Enforcement Managers, and EPA HQ CWA Contacts. The Loading Tool project lead (Carey Johnston) also conducted a webinar on Version 1.2 of the Loading Tool with ACWA on May 2nd that included over twenty representatives from state NPDES programs.

State Comments

Only state NPDES program, Alabama's Department of Environmental Management, provided comments. These comments are shown below.

Our concerns/comments from Alabama is regarding data corrections to the frozen data pulled from ICIS. It is our understanding the frozen ICIS data is the source for the DMR Pollutant Loading Tool calculations.

In the past we have experienced various situations in which we have identified noteworthy discrepancies in State and EPA data reporting and calculations. It seems these discrepancies are the result of infrequent refreshes between ICIS and the various EPA data use sites such as ECHO, OTIS, Envirofact, etc. using this data.

In addition to EPA's limited refresh abilities, the lag time between an ICIS refresh and the reflection of this refreshed data on these other EPA data use sites has been another significant source of the data discrepancies. Since this data has been frozen, I expect that refreshes from ICIS will be infrequent in this application as well, however, data corrections could potentially be enough to impact the results of the DMR Pollutant Loading Tool calculation.

What is the projected refresh frequency between ICIS and the data for the DMR Pollutant Loading Tool?

Other than a data refresh, are there other suggestions or methods of having data corrections reflected in this application?

We appreciate your consideration of the State's comments!

Thank you,

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Response to ADEM

The following are answers to ADEM's questions:

(1) What is the projected refresh frequency between ICIS and the data for the DMR Pollutant Loading Tool?

OECA makes every possible effort to present quality data to the public and identifies limitations to data users. The database supporting this online tool uses annual data extracts from PCS and ICIS with monthly error correction updates from EPA's Integrated Error Correction Process (IECP). The IECP is the main way that OECA uses to update the Oracle database supporting the Loading Tool. States can also e-mail any error corrections that they have done outside of the IECP to the Loading Tool project lead (Carey Johnston). He will take these error corrections and update the Oracle database supporting the Loading Tool. OECA is also developing an automated

procedure to update the Oracle database supporting the Loading Tool with data from ICIS-NPDES on a monthly or bi-weekly schedule. This automatic connection between the Loading Tool and ICIS-NPDES should be complete in the Fall of 2013.

(2) Other than a data refresh, are there other suggestions or methods of having data corrections reflected in this application?

Any comments on the Loading Tool (e.g., data presentation, error corrections) can be sent to Mr. Johnston.