

eSMR Discharger Training Q&A

This list includes questions that were asked during the training held on 6/24/26

- 1. We have been uploading NPDES reports for 5-7 years. Is this a new way to load reports or is this program just being expanded to include other dischargers?**

There have not been changes to the way reports are uploaded and submitted. The training session on 6/24/2026 is mainly for legally responsible officials and data submitters that are new to eSMR.

- 2. Will this training go over the "anticipated bypass" form in the SMR forms?**

The training does not cover bypass reporting. Information on bypass reporting through eSMR, including a Help Guide, can be found at

https://www.waterboards.ca.gov/water_issues/programs/ciwqs/bypass-reporting.html

Programmatic questions regarding bypass should be directed to the Case Manager of your NPDES permit.

- 3. Do you know when the DMR issue will be resolved?**

Between November 2025 and June 2026, DMR expectations sent from USEPA's Integrated Compliance Information System (ICIS) were incomplete for many limit sets, which resulted in many dischargers being unable to submit their results. Complete expectations are again displaying, and Permittees are to submit DMR data moving forward from the July reporting period. Although now available, reports between November 2025 and June 2026 are not required to be submitted.

- 4. How do we submit DMRs that were unlinked during the period that the expectations were not transferring correctly?**

You can link a DMR limit set to a different SMR by selecting it from the list of limit sets on the DMR tab, and it will be submitted to EPA; however, DMR limit sets not submitted between November 2025 and June 2026 are not required to be submitted.

- 5. If instructed by regional water board staff to revise a report, I understand you can withdraw a report to revise for resubmission. Does the report submitted date change at that point to the current date? Also, is there any way to revise the SMR without creating a new CDF file?**

If the report is substantially complete, the submittal or received date will likely not change for a withdrawn report. You will still see the original submittal date in the "Date Received" column of the reports table. However, the case manager has the discretion to update the date to the latest submittal date if the report was substantially incomplete.

The CDF file cannot be updated once it has been created so if there are any changes to the data, you will have to create a new CDF file. However, if data is missing then you can always upload a separate CDF file to your report.

- 6. Are there any documents available on discussing considerations for managing a CDF file utilizing LIMS?**

If you are using LIMS, then you can set up your LIMS to export a file consistent with our CIWQS Data Format (CDF). Please see CDF setup guide here:

https://www.waterboards.ca.gov/water_issues/programs/ciwqs/docs/chc_npdes/nd_dnq_guidance.pdf

7. When was the last update of the PET tool?

The last update of the PET Tool was in March 2026. It is typically updated with new valid values (parameters, analytical methods, etc.). If a value is missing from the PET Tool then you can contact the CIWQS Help Center (CIWQS@waterboards.ca.gov) and request to have it added.

8. Can we make recommendations for additional QA codes?

You can submit the request to the CIWQS Help Center (ciwqs@waterboards.ca.gov)

9. If we need to flag data reported, we can use a method other than the QA_CODE field?

Lab flags should be reported through the use of the QA Code field. Other issues can be communicated through comments or the cover letter.

10. Regarding the no-discharge dates, our permit only requires us to collect stormwater samples from two events per year. We aren't checking every single day whether there is discharge or not. How should we complete this part?

Since this is a permit specific question, please consult your permit Case Manager.

11. Is it required to fill the "Analytical Data" tab if we upload the zip file on the EDF/CDF tab?

No, it is not required if you already uploaded the data via CDF file. The Analytical Data and Calculated Data tabs are for manual entries.

12. For data below MDL, do we still need to enter QA code?

According to the ND/DNQ Guidance document, a result below the MDL is considered "Not detected (ND)" and does not require a QA code to be entered. You may reference this document:

https://www.waterboards.ca.gov/water_issues/programs/ciwqs/docs/chc_npdes/nd_dnq_guidance.pdf

13. If a concentration is not detected (ND) then how should a mass be entered. Do we calculate the mass based on the RL?

Please consult the "Compliance Determination" section of your permit for guidance on calculating mass loading or discuss with your Case Manager if that section doesn't exist.

14. If the cover letter discussed the violation, does it have to be reported in Violations tab?

Yes, violations must be reported in the Violation tab in addition to discussing in the cover letter.

15. Could you please elaborate on what QA codes are or where to find more info on difference between QA codes and qualifiers?

QA codes are flags provided by the laboratory about the laboratory analysis. The available codes and code combinations can be found on the "Lookup Codes" tab of the PET Tool, cells Z2:AA20. Additional codes can be requested through the CIWQS Help Desk.

Qualifiers provide information about the result. Typically, the qualifier is "=". It could also be "ND" or "DNQ."

16. Why does EPA have a separate DMR report? Aren't we re-submitting the same information we submitted in the SMR but in a more cumbersome format?

While SMR and DMR data have a lot of overlap, they are not the same. The mapping, cross walking, and compliance determinations needed to fulfill DMR data requirements using SMR data is challenging and Water Board staff have not felt that it could be done correctly in all cases.

17. What type of files are allowed for DMRs?

If uploading your DMRs, it must be a CSV file. The format can be found here:

https://www.waterboards.ca.gov/water_issues/programs/ciwqs/docs/dmr_upload_format.xls

18. Should the MDL include any applicable dilution factors, or should we use the actual MDL?

The result should represent the concentration in the sample water. If a dilution was needed to analyze the sample correctly, that dilution should be figured into the result presented by the lab.

19. Can you confirm the only tabs that there are no existing templates for are the No Discharge and Violations tab?

There are upload templates only for the CDF/EDF tab and the DMR tab.

20. When reporting a result below the MDL, should it be reported as zero, one-half the MDL, or at the MDL value?

For reporting, use the "ND" qualifier and report the MDL in the MDL column, leaving the result column blank. For calculations, consult the "Compliance Determination section of your permit or discuss with your Case Manager if that section doesn't exist.

21. Do we need to use the newest recommended PET Tool? Or is it okay to continue using the previous version?

You may continue to use an older version of the PET Tool at this time. If there is a mandatory migration in the future, the Water Board will communicate that.

22. Does the Post-Certified tab only pop up after the SMR has been reviewed?

The Post-Certified tab becomes available after submission, regardless of review status.

23. With EBkey coming up in 2027, will formats for submission remain the same?

Yes, the data submission will be the same, but the login process will be different. The report submission, such as providing the correct password at the time of submission, may also change.

24. Our auditor was asking how the board knows which are contract lab data on our report

The lab reports that can be uploaded to the Attachments Tab convey this information. Alternatively, SampleIDs can be added as a comment, which may help track this information.

25. Does the PDF summary report for an eSMR that includes laboratory data need to be in TNI report format?

While not specifically required by for eSMR, because most analysis must be performed by an ELAP accredited lab, the uploaded lab reports should contain the elements that are required by ELAP.

ELAP requires all accredited laboratories to report data with minimum components in the report, identified in section 5.10 of the 2016 TNI standard incorporated by reference in ELAP's regulations in the California Code of Regulations, title 22, chapter 19. These requirements do not identify a specific format that reports must take, they only identify minimum components; the laboratory is free to organize its report how it sees fit so long as the minimum components are contained within. However, this requirement also allows for "*... in the case of a written agreement with the customer, the results may be reported in a simplified way. Any information listed in 5.10.2 to 5.10.4 which is not reported to the customer shall be readily available in the laboratory which carried out the tests.*" This does not extend to every requirement, such as clear identification of non-accredited tests, clear identification of any subcontracted laboratory work, clear identification of revisions (if any), and minimization of misunderstanding or misuse.